

**IOS IMESSAGE/SMS/MMS**

<b>CHAT PARTICIPANTS</b>	
Number of participants	2
Display names	+13038852550
	Local User
Local user	
<b>CONVERSATION DETAILS</b>	
Number of messages	41
First message sent date/time	11/16/2020 2:08:33 AM
Last message sent date/time	3/8/2021 2:49:36 PM
Case time zone	(UTC) Coordinated Universal Time

**+13038852550**
 ↔ Unknown direction  
 12/23/2020 4:02:54 PM

Hey, Jim. I'm doing morning drive in Denver tomorrow. Any time for radio on Coomer lawsuit and your reporting?

**Exhibit  
 PX 0079**  
 Hoft

**IOS IMESSAGE/SMS/MMS**

<b>CHAT PARTICIPANTS</b>	
Number of participants	2
Display names	+13036675105
Local user	Local User
Local user	
<b>CONVERSATION DETAILS</b>	
Number of messages	14
First message sent date/time	11/16/2020 2:15:31 AM
Last message sent date/time	11/25/2020 5:31:16 AM
Case time zone	(UTC) Coordinated Universal Time

**Local User <Jim iPad\_00008101-000C44900CA0001E\_2>**

↔ Unknown direction  
11/24/2020 4:30:55 AM

This is Jim Hoft — Joe has anyone seen Eric Coomer? Does anyone know where he is? Has he popped his head up at all?

**Exhibit  
PX 0080**  
Hoft

**IOS IMESSAGE/SMS/MMS**

<b>CHAT PARTICIPANTS</b>	
Number of participants	3
Display names	+13038852550 +14042855853 Local User
Local user	
<b>CONVERSATION DETAILS</b>	
Number of messages	3
First message sent date/time	11/16/2020 1:43:33 AM
Last message sent date/time	11/16/2020 2:31:25 AM
Case time zone	(UTC) Coordinated Universal Time

↔ Unknown direction  
11/16/2020 1:43:33 AM

**+14042855853**

Jim, meet Randy Corporon. Randy, meet Jim Hoft. I'll let you take it from here.

**Exhibit  
PX 0081**  
Hoft

**IOS IMESSAGE/SMS/MMS**

<b>CHAT PARTICIPANTS</b>	
Number of participants	2
Display names	+13038852550
	Local User
Local user	
<b>CONVERSATION DETAILS</b>	
Number of messages	41
First message sent date/time	11/16/2020 2:08:33 AM
Last message sent date/time	3/8/2021 2:49:36 PM
Case time zone	(UTC) Coordinated Universal Time

**+13038852550**
 ↔ Unknown direction  
 11/16/2020 2:08:33 AM

Hi Jim. Randy Corporon, Rep Natl Committeeman, Chair of largest Tea Party group in CO, atty, radio host.

My client/friend Joe Oltmann just told me you guys are talking in 15 so that will handle what I wanted to talk about.

Thank you!

**Exhibit  
PX 0082**  
 Hoff



**IOS IMESSAGE/SMS/MMS**

<b>CHAT PARTICIPANTS</b>	
Number of participants	2
Display names	+13038852550
	Local User
Local user	
<b>CONVERSATION DETAILS</b>	
Number of messages	41
First message sent date/time	11/16/2020 2:08:33 AM
Last message sent date/time	3/8/2021 2:49:36 PM
Case time zone	(UTC) Coordinated Universal Time

**Local User <Jim iPad\_00008101-000C44900CA0001E>**

Ok thanks Randy. We just spoke. Quite a story he has!

↔ Unknown direction  
11/16/2020 2:30:54 AM

**Exhibit  
PX 0083**  
Hoft

**IOS IMESSAGE/SMS/MMS**

<b>CHAT PARTICIPANTS</b>	
Number of participants	2
Display names	+13038852550
	Local User
Local user	
<b>CONVERSATION DETAILS</b>	
Number of messages	41
First message sent date/time	11/16/2020 2:08:33 AM
Last message sent date/time	3/8/2021 2:49:36 PM
Case time zone	(UTC) Coordinated Universal Time

**+13038852550**

↔ Unknown direction

11/16/2020 2:35:58 AM

Yes. And, he understands the technology, code, back-door access even though we don't have any proof of that. Sounds like Rudy and Sidney Powell do though. I'm trying not to bug her. But she has said specifically that votes were switched. God bless whistleblowers?!

**Exhibit**  
**PX 0084**  
Hoft

**IOS IMESSAGE/SMS/MMS**

<b>CHAT PARTICIPANTS</b>	
Number of participants	2
Display names	+13036675105
	Local User
Local user	
<b>CONVERSATION DETAILS</b>	
Number of messages	14
First message sent date/time	11/16/2020 2:15:31 AM
Last message sent date/time	11/25/2020 5:31:16 AM
Case time zone	(UTC) Coordinated Universal Time

**+13036675105**

I sent someone to his house and no sign of him

 ⇌ Unknown direction  
 11/24/2020 4:32:15 AM

**Exhibit**  
**PX 0085**  
 Hoft

12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

## **Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipulate the Vote**

By Jim Hoft

Published November 13, 2020 at 7:55am

632 Comments



**Eric Coomer**

Director Product  
Strategy & Security,  
Dominion Voting  
Systems

**Dr. Eric Coomer who is responsible for the strategy and Security of Dominion Voting Systems at Dominion Voting Systems.**

**But if you search the company's profile Eric Coomer has since been removed from their page of directors.**

12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

<https://archive.is/z87aG>

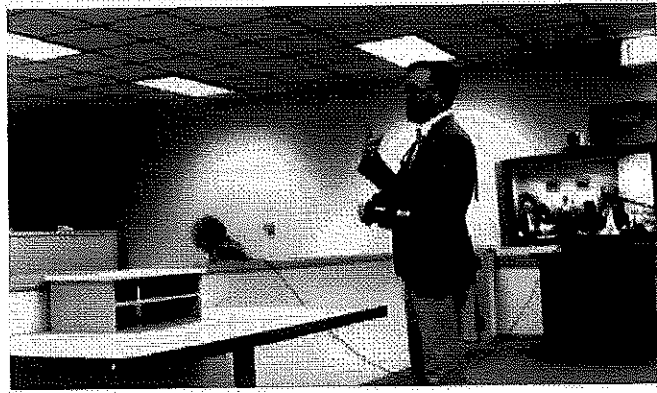
In 2016 Coomer **told the Illinois States Board of Elections** that it was possible to bypass election systems software.

GP

12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

(Sep. 1, 2016) — On Friday, August 26<sup>th</sup>, during a meeting at the Illinois State Board of Elections, the Vice President of Engineering for Dominion Voting, Dr. Eric Coomer\*, was asked if it was possible to bypass election systems software and go directly to the data tables that manage systems running elections in Illinois. His response was, "Yes, if they have access."



Here is more from the 2016 article at **the Post and Email**:

**Dr. Coomer's statement brings to light a very serious issue all voters should understand.** Voting systems must be re-certified each time they make changes to the hardware or software. Recertification is an expensive and time consuming process. **What Dr. Coomer told the Board is that Dominion Voting does not go back for recertification of software when threats to their code are discovered.** Rather, they rely on post-election audits and providing advice to election jurisdictions about security. I have reviewed all of the recertification documents produced by Dominion, and I do not recall any software adjustments for security purposes.

**This is the reality of the security of your vote.** Software systems that count and record the vote across Illinois and throughout the USA are not updated to address security problems, and even if they were, the software can be completely bypassed by going to the data tables that drive the systems.

Here is the video...



12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

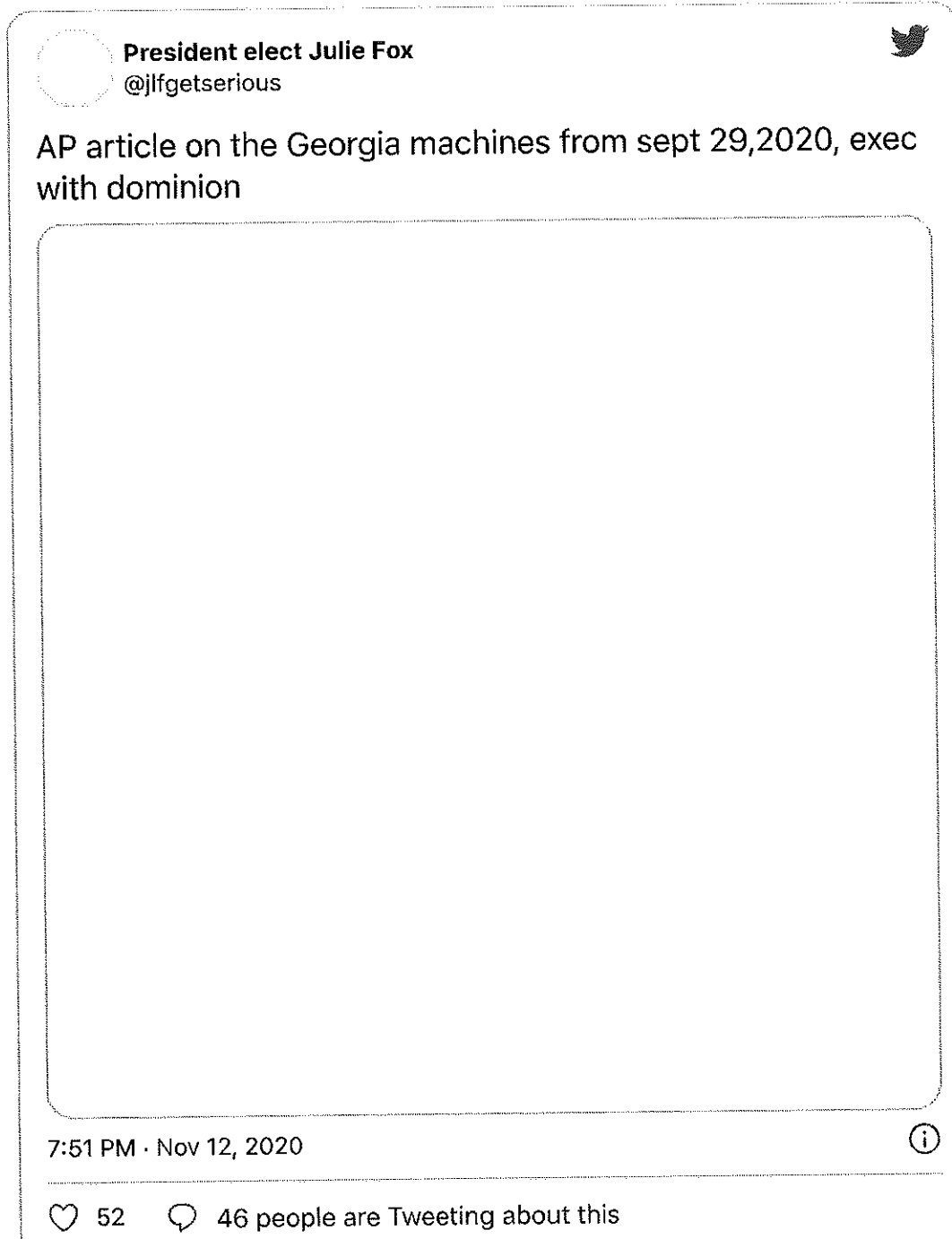
Dominion was written about by the Clinton Global Initiative.

**The AP mentioned Coomer in their September article.**



12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...



12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

### **More...**

Entrepreneur **Joe Oltmann** researched the Dominion Voting Systems this week after news broke on the unexplained **computer “glitches” that mysteriously took votes** from President Trump in many states and gave those votes to Joe Biden or erased the votes completely.

**Joe Oltmann did a deep dive on Dr. Eric Coomer who is responsible for the strategy and Security of Dominion Voting Systems.**

**Oltmann posted a Facebook post by Coomer from June. Dr. Coomer retweeted the “Antifa” manifesto letter to President Trump.**

**Needless to say Dr. Coomer is NOT a Trump supporter!**

*This is a FB post from Dr. Eric Coomer. This is the Antifa “manifesto” letter to Trump. This is the man that is responsible for the strategy and Security of Dominion Voting Systems. I will post all of the posts here over the next couple of days. Share and follow **[pic.twitter.com/E2rK9TznVw](https://twitter.com/E2rK9TznVw)***

*– Joe Oltmann (@JoeOltmann) **November 12, 2020***

Here is that letter:

12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

page 2

12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

page 3

12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

page 4

12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

**Joe Oltmann also posted other anti-Trump Facebook posts by Dr. Coomer including a YouTube video titled “Dead Prez.”**

**Twitter removed Joe Oltmann’s account last night for some reason.**

**It is very interesting that Twitter would remove the one account that was investigating Coomer, his far left background and his role at Dominion.**

12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

## Submit a Correction



**Jim Hoft**

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Jim Hoft is the founder and editor of The Gateway Pundit, one of the top conservative news outlets in America. Jim was awarded the Reed Irvine Accuracy in Media Award in 2013 and is the proud recipient of the Breitbart Award for Excellence in Online Journalism from the Americans for Prosperity Foundation in May 2016.



12/17/2020

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipul...

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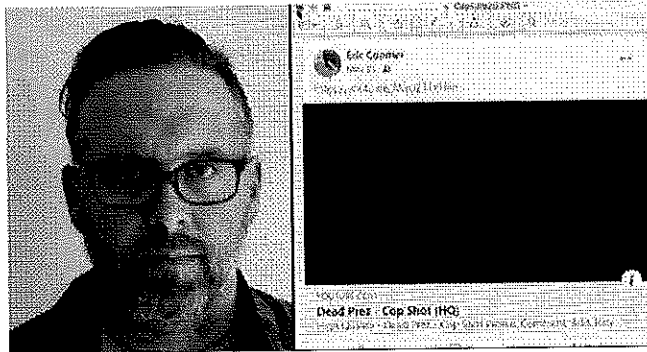
[YouTube](#)

[Terms](#)

[Contact](#)

## Report: Anti-Trump Dominion Voting Systems Security Chief Was Participating in Antifa Calls, Posted Antifa Manifesto Letter to Trump Online

By Ilm Hof  
Published November 14, 2020 at 9:21pm  
878 Comments



In 2010 Eric Coomer joined Dominion as Vice President of U.S. Engineering. According to his **bio**, Coomer graduated from the University of California, Berkeley with a Ph.D. in Nuclear Physics.

Eric Coomer was later promoted to Voting Systems Officer of Strategy and Security although Coomer has **since been removed** from the Dominion page of directors.



In a stunning interview conducted by **Michelle Malkin, Joe Oltmann**, FEC (Faith Education Commerce) United founder, reveals how he infiltrated Antifa and how during a conversation with Antifa members, he discovered "Eric from Dominion" was allegedly part of the chat during the week of September 27, 2020.

Oltmann explained that "Eric" was telling the Antifa members they needed to "keep up the pressure." When one of the caller's asked, "Who's Eric?" someone answered, "Eric, he's the Dominion guy." Oltmann said that as the conversation continued, someone asked, "What are we gonna do if F\*cking Trump wins?" Oltmann paraphrased how Eric (the Dominion guy) responded, **"Don't worry about the election, Trump's not gonna win. I made f\*cking sure of that!"**

After Oltmann, who runs a data company, finished the call, he started to

**Exhibit  
PX 0087**  
Hof

investigate "Eric from Dominion," in Denver, CO., and came upon Eric Coomer. Oltmann admitted that it didn't make sense that Eric Coomer would be the Antifa member on the call and that at the time, he knew nothing about Dominion Voting Systems.

It wasn't until after he started hearing about Dominion Voting Systems in the news following the election that he remembered the remarks made by "Eric from Dominion" on the Antifa chat.

Oltmann began digging into Eric Coomer, trying to find anything he could about him. Oltmann finally **hit gold when he was able to (legally) access** what he claims is Dominion VP, Eric Coomer's Facebook page. What he found was stunning. Joe Oltmann said he never saw such hate and vitriol coming from someone who has a Ph.D. in Nuclear Physics. Oltmann explained to Malkin that Coomer actually re-posted the Antifa manifesto to President Trump on his Facebook page.

Do you think Dominion was in on the steal?

☐ Yes ☐ No

Enter your email

Submit

Completing this poll entitles you to The Gateway Pundit news updates free of charge. You may opt out at anytime. You also agree to our [Privacy Policy](#) and [Terms of Use](#).

The Gateway Pundit posted a copy of **that Antifa letter to Trump** in a previous report.

Joe Oltmann was removed from Twitter this week. His tweets on Eric Coomer upset big tech.

Oltman admits that by revealing this information about Coomer, he is putting himself in danger.

He may have a Ph.D. in Nuclear Physics, but when it comes to hiding his hatred for President Trump, Trump supporters, law enforcement, or even for Texans, Dominion's Eric Coomer isn't very smart.

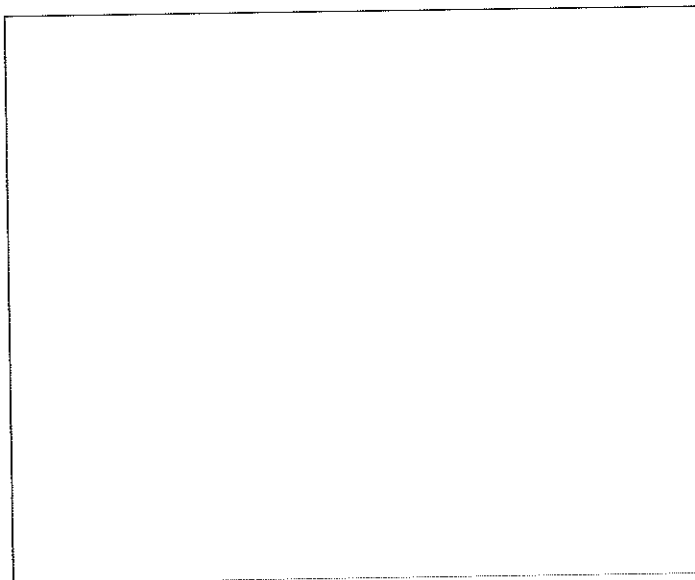
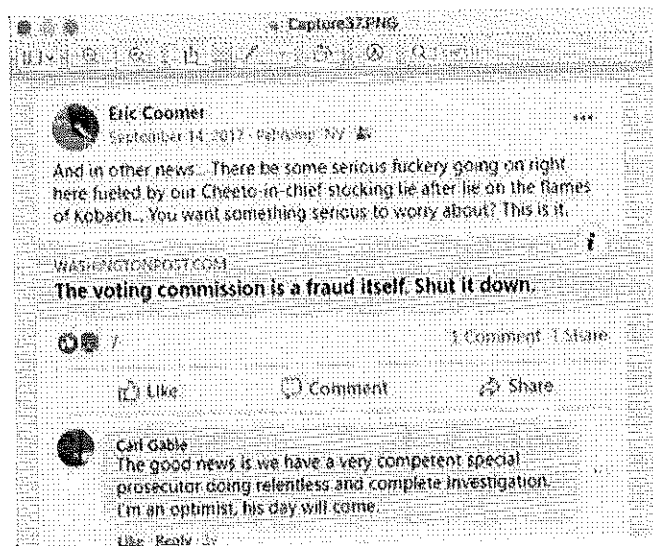
In 2017, when Coomer was in Nevada, he mocked President Trump's Election Integrity Commission on Facebook.

Coomer shared a **Washington Post** article titled, "The voting commission is a fraud itself. Shut it down." The article, written by the unhinged Trump hater Jennifer Rubin, was an attack on President Trump's May 11, 2017, **Executive**

**Order** on the Establishment of Presidential Advisory Commission on Election Integrity.

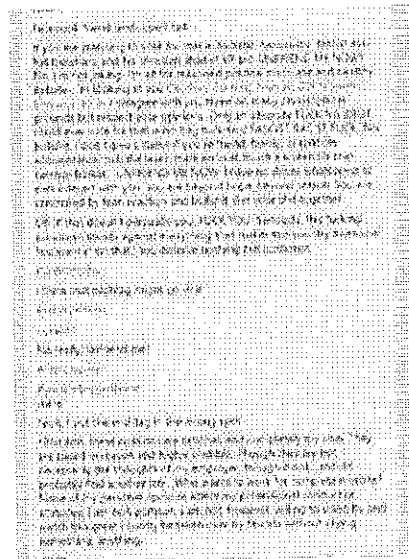
What about Trump's Election Integrity Commission triggered Coomer? Was it the part about "Vulnerabilities in *voting systems* and practices used for Federal elections that could lead to improper voter registrations and *improper voting*, including fraudulent voter registrations and *fraudulent voting*," that caused Coomer to have a childish meltdown on his Facebook page?

Dominion's Director of Strategy and Security's response to Rubin's article appears to be a bit unhinged: "And in other news...There be some serious fuckery going on right here fueled by our Cheeto-in-chief stocking lie after lie on the flames of [former Kansas Sec. of State Chris] Kobach...You want something serious to worry about? This is it. "



Here's what Coomer had to say to his "friends" on Facebook on July 21, 2016, who are Trump supporters.





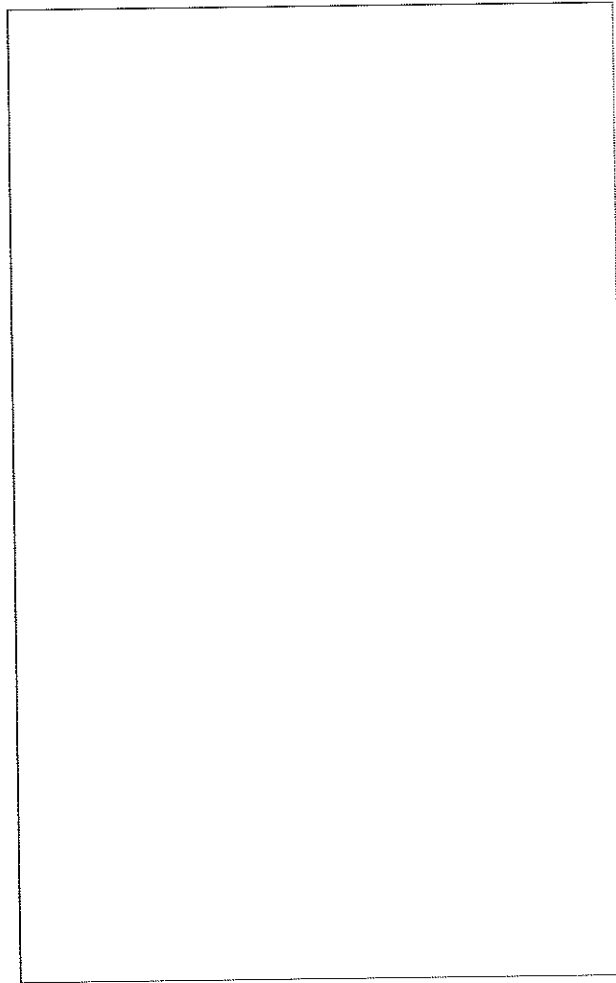
**From Coomer's Facebook post:**

**Facebook friend land- open call-**

*If you are planning to vote for the autocratic, narcissistic, fascists, ass-hat blowhard and his Christian jihadist VP pic, UNFRIEND ME NOW! No, I'm not joking. I'm all for reasoned political discourse and healthy debate- I'm looking at you ( 3 names of friends). I disagree with you three on many philosophical grounds but respect your opinions. Only and absolute FUCKING IDIOT could ever vote for that wind-bag fuck-tard FASCIST RACIST FUCK! No bullshit, I don't give a damn if you're friend, family, or random acquaintance, pull the lever, mark an oval, touch a screen for that carnival barker--UNFRIEND ME NOW. I have no desire whatsoever to ever interact with you. You are beyond hope, beyond reason. you are controlled by fear, reaction, and bullshit. Get your shit together.*

*Oh, it that doesn't persuade you, FUCK YOU! Seriously, this fucking ass-clown stands against everything that makes this country awesome! You want in on that? You deserve nothing but contempt.*

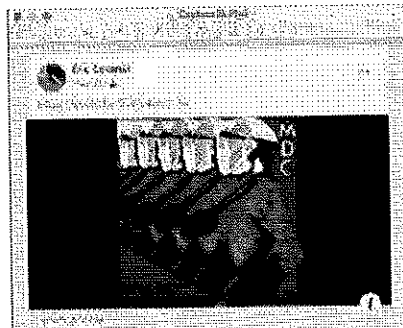
*Near the bottom of his rant, Coomer clarifies: "These opinions are rational and completely my own. They are based in reason and highly credible. Though they are not necessarily the thoughts of my employer, though if not, I should probably find another job. Who wants to work for complete morons?" Coomer appears to be trying to cover his tracks, "None of my personal opinions affect my professional conduct or attitudes," adding, "I am non-partisan."*

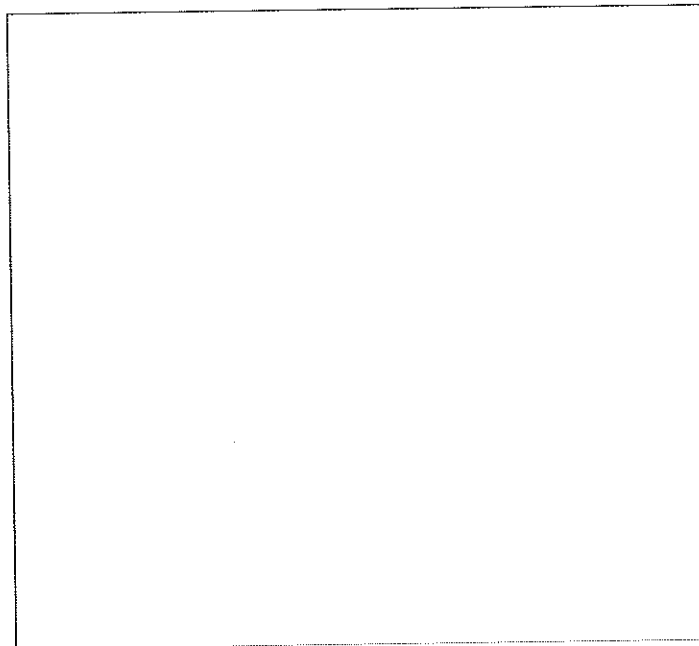
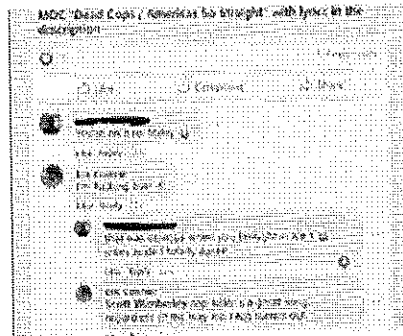


According to Oltmann, Eric Coomer isn't a big fan of the police. During his interview with Malkin, he shared several screenshots of anti-police rhetoric like an image a link to YouTube from the hip-hop song "Dead Prez."

Here's a portion of the lyrics from the "Dead Prez" song in case it's not on your personal playlist:

Is there heaven for us hip-hop heathens  
Big Pop and Pac, even Eazy had 'em leanin'  
We all children lookin' for a reason  
What do you believe in, betrayal, treason?  
I'm out for dead presidency  
I'm out for dead presidency  
I'm out for dead presidency  
I'm out for dead fuckin' presidents that represent me

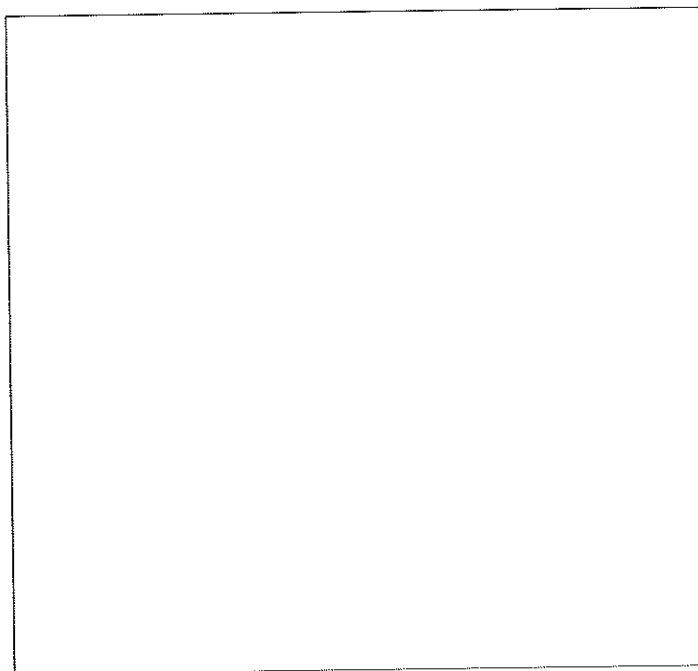




This screenshot, captured by Joe Oftmann, makes one wonder if Eric's not a fan of the United States either.







**A lot of people may be glad to know that Texas rejected using  
Dominion Voting Systems in their state after reading this garbage!**

**30 states in America, including every critical swing state in the  
November election, used Dominion Voting Systems.**

**Submit a Correction**



**Jim Hoft**

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Jim Hoft is the founder and editor of The Gateway Pundit, one of the top conservative news outlets in America. Jim was awarded the Reed Irvine Accuracy in Media Award in 2013 and is the proud recipient of the Breitbart Award for Excellence in Online Journalism from the Americans for Prosperity Foundation in May 2016.

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1/11/2021

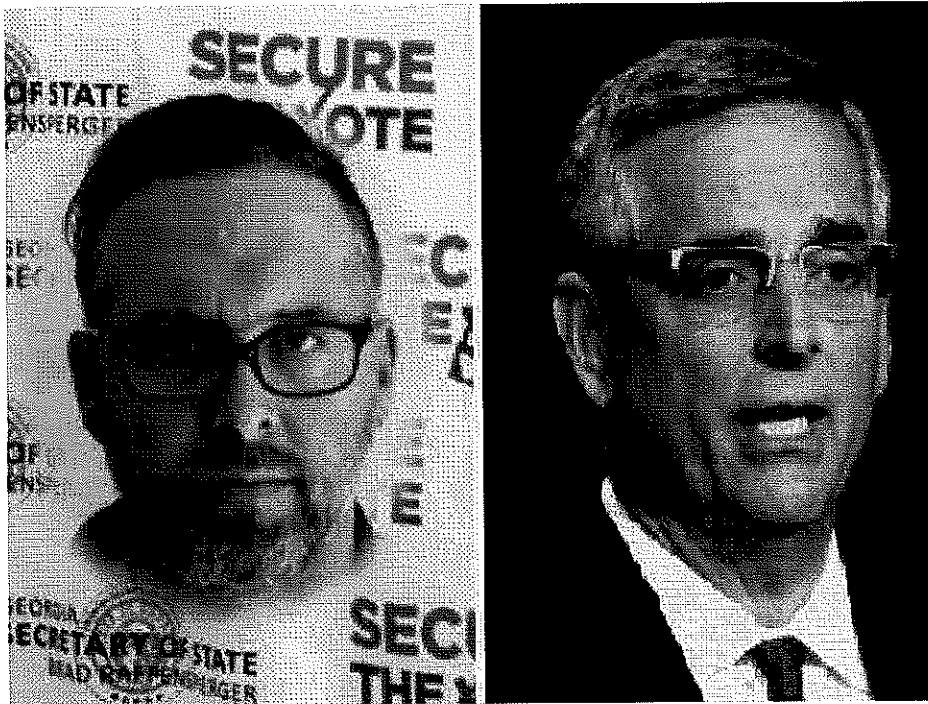
Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violat...

## Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violates Any Certification of State Results

By Joe Hoft

Published January 4, 2021 at 8:15am

424 Comments



**Georgia's corrupt Secretary of State Brad Raffensperger is in criminal trouble now after leaking a phone call with the President of the United States.**

**Raffensperger is also responsible for approving an update to the voting machines in the state days before**

1/11/2021

Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violat...

## **the 2020 election which was illegal and should invalidate the results of the election in the state.**

Yesterday it was reported that Georgia's corrupt Secretary of State (SoS) Brad Raffensperger is the party to two lawsuits from the President of the United States after leaking information related to their recent phone call:

### ***President Trump Files Two Lawsuits Against Dirty Georgia Secretary of State Raffensperger for Leaking Confidential Litigation Call***

**GP**

---

But quite frankly, Raffensperger has done much worse. The Georgia SoS is to ensure secure and accurate elections. And, yet he allowed Dominion voting machines to be used in the 2020 Presidential election opening the door to blatant discrepancies and fraud.

But it gets worse... Raffensperger actually allowed an update to the software used in these Dominion voting machines only days before the 2020 election.

We reported on this weeks ago:

1/11/2021

Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violat...

***Dominion's Trump-Hating Executive Eric Coomer Performed a Suspicious Update in Georgia a Week Before Early Voting Started***

As we noted, a local news channel actually reported on this update:

**CD Media reports** that the update was to the imaging system in Dominion's machines:

*After the election equipment is certified for use, **no changes can be made to the software or hardware without SoS and EAC approval and maintain the certification for the election.***

***According to a 2020 election lawsuit filed in GA**, during September 2020 ahead of the general election GA SoS Raffesperger ordered county election officials to do a complete software wipe of the BMDs [Ballot Marketing Devices] and install brand new software that never went through the certification process. **As of the October 2<sup>nd</sup> report, Dominion had not submitted a request for this major change with the U.S. Election Assistance Commission (EAC).***

1/11/2021

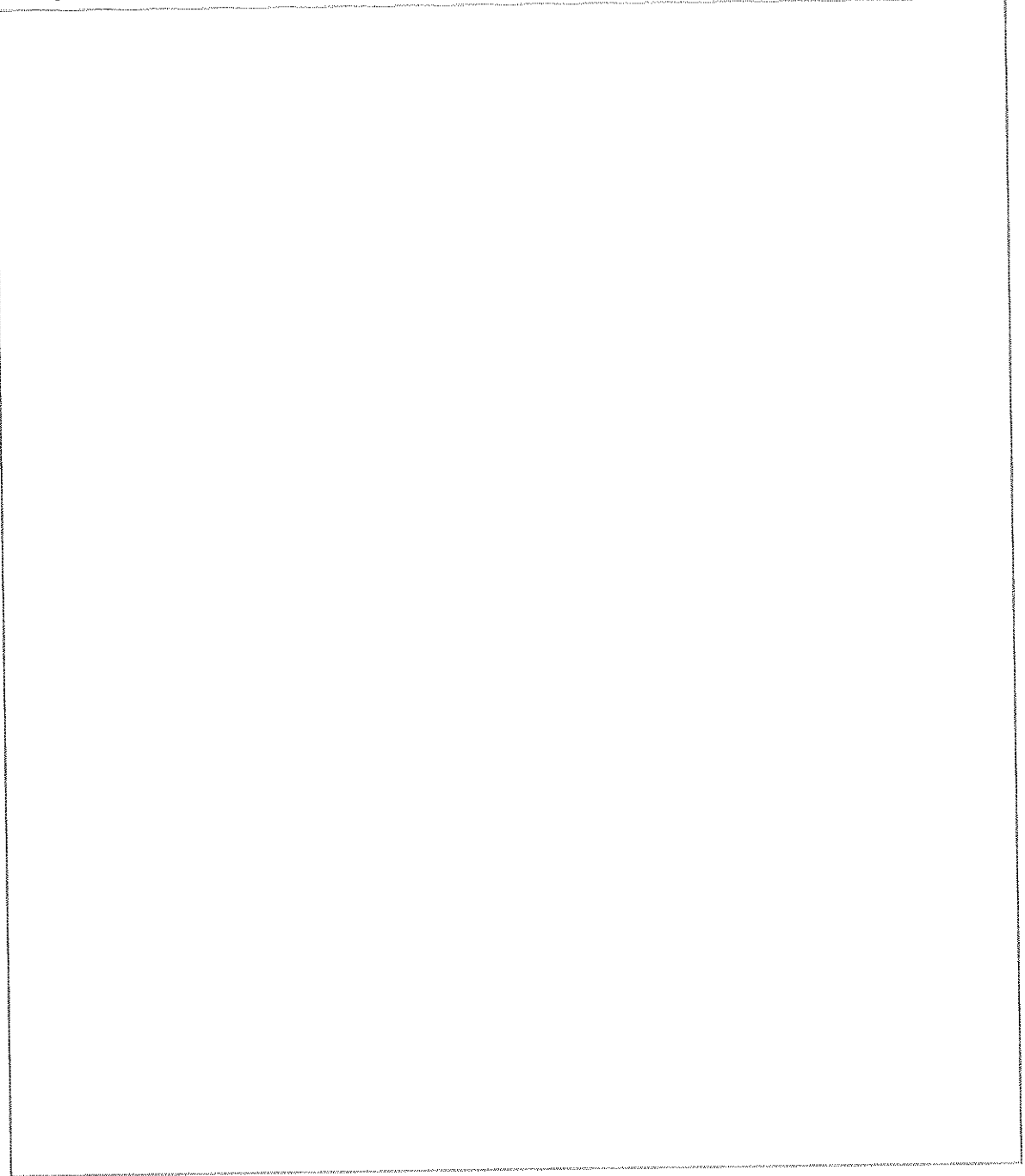
Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violat...

*According to the Master Technical Evaluation listed above, both Dominion and the GA SoS are very clear on the fact that **this breaks the certification for GA and may well get the ballots voters cast tossed as a result.** The new software was never even tested to see if it caused other issues with the system.*

***GA SoS Raffensperger ordered counties to make the change knowing it is illegal in GA and puts the onus of liability on the county election managers themselves if they complied.** This email, from the lawsuit shows how serious the situation is. SoS Raffensperger also helped draft a loophole in the law to make EAC certification meaningless even though GA law demands compliance with Federal election standards.*

1/11/2021

Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violat...



**George Eliason at CD media** goes on to discuss the illegal updates made in Georgia before the 2020 election and then after much more information and fact, Eliason ends with this:

*Stacy Abrams lobbied online to get Dominion's Democracy Suite for this election because she is part of that system with Governor Brian Kemp and SoS Raffenspurger.*



1/11/2021

Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violat...

***Georgia's Constitutional rights and citizen's rights have been violated during every election for the past 18 years every time someone took advantage of this voting system at every level it's used for. Your vote didn't matter. Your election was decided for you. Georgia! I'm offended for you.***

*Both Republicans and Democrats use these corrupted elections systems to gain power and wealth today at the expense of voters. If you voted for Joe Biden and think it's ok because your candidate won, think again.*

*Every time a good qualified candidate who is for the American people runs, the election WILL BE STOLEN if this isn't stopped now. Georgia, it's time to say no more!*

*The 2020 ELECTION WAS STOLEN. If the information above doesn't convince you, it's because you're part of the problem. Donald Trump won the 2020 election.*

**And there it is...**

1/11/2021

Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violat...

## Submit a Correction

**Joe Hoft**[Summary](#)[Recent Posts](#)[Contact](#)

Joe Hoft is the twin brother of TGP's founder, Jim Hoft. His posts have been retweeted by President Trump and have made the headlines at the Drudge Report. Joe worked as a corporate executive in Hong Kong and traveled the world for his work, which gives him a unique perspective of US and global current events. He has ten degrees or designations and is the author of three books. His new book: 'In God We Trust: Not in Lying Liberal Lunatics' is out now - please take a look and buy a copy.

[@joehoft](#)**Gateway Pundit***Where Hope Finally Made a Comeback.*

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<b>ERIC COOMER, Ph.D., Plaintiff</b>  vs.  <b>DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants</b>	
<b>Attorneys for Plaintiff</b> Charles J. Cain, No. 51020 <a href="mailto:ccain@cstrial.com">ccain@cstrial.com</a> Steve Skarnulis, No. 21PHV6401 <a href="mailto:skarnulis@cstrial.com">skarnulis@cstrial.com</a> Bradley A. Kloewer, No. 50565 <a href="mailto:bkloewer@cstrial.com">bkloewer@cstrial.com</a> Zachary H. Bowman, No. 21PHV6676 <a href="mailto:zbowman@cstrial.com">zbowman@cstrial.com</a> <b>CAIN &amp; SKARNULIS PLLC</b> P. O. Box 1064 Salida, Colorado 81201 719-530-3011/512-477-5011 (Fax)  Thomas M. Rogers III, No. 28809 <a href="mailto:trey@rklawpc.com">trey@rklawpc.com</a> Mark Grueskin, No. 14621 <a href="mailto:mark@rklawpc.com">mark@rklawpc.com</a> Andrew E. Ho, No. 40381 <a href="mailto:andrew@rklawpc.com">andrew@rklawpc.com</a> RechtKornfeld PC 1600 Stout Street, Suite 1400 Denver, Colorado 80202 303-573-1900/303-446-9400 (Fax)	Case Number: 2020cv034319  Division Courtroom: 409
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STATE OF COLORADO  
1437 Bannock Street  
Denver, CO 80202

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ERIC COOMER, Ph.D.,  
Plaintiff,

Case Number 20CV34319

Courtroom 409

vs.

DONALD J. TRUMP FOR PRESIDENT, INC.,  
SIDNEY POWELL, SIDNEY POWELL, P.C.,  
RUDOLPH GIULIANI, JOSEPH OLTSMANN,  
FEC UNITED, SHUFFLING MADNESS MEDIA, INC.,  
dba CONSERVATIVE DAILY, JAMES HOFT,  
TGP COMMUNICATIONS LLC, dba THE GATEWAY PUNDIT,  
MICHELLE MALKIN, ERIC METAXAS, CHANEL RION,  
HERRING NETWORKS, INC., dba ONE AMERICA  
NEWS NETWORK, and NEWSMAX MEDIAN, INC.,  
Defendants.

VIDEO-RECORDED REMOTE DEPOSITION OF  
MICHELLE MALKIN

July 27, 2021

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<p>1 PROCEEDINGS</p> <p>2 * * * * *</p> <p>3 THE VIDEOGRAPHER: Good morning. We're going on</p> <p>4 the record at 10:04 a.m., Mountain Time, on July 27, 2021.</p> <p>5 Please note that microphones are sensitive and</p> <p>6 may pick up whispering, private conversations, and</p> <p>7 cellular interference. Please turn all off cell phones or</p> <p>8 place them away from the microphones, as they can</p> <p>9 interfere with the deposition audio.</p> <p>10 Audio and video recording will continue to take</p> <p>11 place unless all parties agree to go off the record.</p> <p>12 This is Media Number 1 of the video-recorded</p> <p>13 deposition of Michelle Malkin, taken by counsel for the</p> <p>14 Plaintiffs in the matter of Eric Coomer, Ph.D., v.</p> <p>15 Donald J. Trump for President, Inc., et al., filed in the</p> <p>16 District Court, District of Colorado – District Court,</p> <p>17 Denver County, State of Colorado, Case Number</p> <p>18 2020CV034319.</p> <p>19 This deposition is being held remotely with all</p> <p>20 parties at various locations.</p> <p>21 My name is Dennis Clayton for the firm Myers</p> <p>22 Legal Video, and I am the videographer. The court</p> <p>23 reporter today is Sara Stueve from the firm Veritext Legal</p> <p>24 Solutions.</p> <p>25 I am not related to any party in this action,</p> <p>Page 6</p>	<p>1 MICHELLE MALKIN,</p> <p>2 having been first duly sworn to state the whole truth,</p> <p>3 testified as follows:</p> <p>4 MR. CAIN: Before the deposition started, we</p> <p>5 discussed and agreed amongst the lawyers that one</p> <p>6 objection by the defendants' lawyer would be sufficient to</p> <p>7 preserve objections by all defendants.</p> <p>8 I'm getting some feedback on the audio. I don't</p> <p>9 know what that is about, but hopefully it will correct</p> <p>10 itself.</p> <p>11 MR. ARRINGTON: So whoever Lexi Christopher is</p> <p>12 probably needs to mute.</p> <p>13 MR. CAIN: Okay.</p> <p>14 DIRECT EXAMINATION</p> <p>15 MR. CAIN:</p> <p>16 Q. Ma'am, state your full name for the record,</p> <p>17 please.</p> <p>18 A. Michelle Malkin.</p> <p>19 Q. Good morning, Ms. Malkin. My name is Charlie</p> <p>20 Cain. I introduced myself to you about eight minutes ago;</p> <p>21 right?</p> <p>22 A. Yes.</p> <p>23 Q. Let's jump right in.</p> <p>24 When did you first meet Joe Oltmann?</p> <p>25 A. I have -- he has recalled meeting me, but I</p> <p>Page 8</p>
<p>1 nor am I financially interested in the outcome.</p> <p>2 Because of the large number of participants,</p> <p>3 counsel and everyone attending remotely will place their</p> <p>4 appearances and affiliations for the record on --in the</p> <p>5 chat room and will be reflected on the transcript.</p> <p>6 The court reporter has a brief statement and</p> <p>7 then will swear in the witness.</p> <p>8 THE REPORTER: Thank you, Dennis.</p> <p>9 The attorneys participating in this deposition</p> <p>10 acknowledge that I am not physically present in a</p> <p>11 deposition room and that I will be reporting this</p> <p>12 deposition remotely.</p> <p>13 They further acknowledge that, in lieu of an</p> <p>14 oath administered in person, the witness will verbally</p> <p>15 declare her testimony in this matter is given under</p> <p>16 penalty of perjury.</p> <p>17 The parties and their counsel consent to this</p> <p>18 arrangement and waive any objections to this manner of</p> <p>19 reporting.</p> <p>20 If there are any objections to this matter of</p> <p>21 reporting, please state them at this time.</p> <p>22 Hearing none, Ms. Malkin, will you raise your</p> <p>23 right hand, please.</p> <p>24 //</p> <p>25 //</p> <p>Page 7</p>	<p>1 don't remember it, years ago at an event.</p> <p>2 Q. Okay. Your audio is cutting out. You said</p> <p>3 that -- and respond again? I didn't hear what you said.</p> <p>4 A. I said that he recalled meeting me years ago at</p> <p>5 a book event, and I did not recall it.</p> <p>6 Q. Okay. When do you recall first meeting</p> <p>7 Joe Oltmann?</p> <p>8 A. I don't recall having met him before the</p> <p>9 interview that we did. I meet a lot of people. I knew</p> <p>10 about him, but I don't recall exactly when I first met</p> <p>11 him.</p> <p>12 Q. Okay. Did you speak at a July 20, 2020, rally</p> <p>13 in Denver that Mr. Oltmann also attended?</p> <p>14 THE REPORTER: Counsel, your audio is also</p> <p>15 cutting out. I'm concerned that this deposition is going</p> <p>16 to be difficult until we resolve this audio issue.</p> <p>17 MR. CAIN: All right. Let's go off the record.</p> <p>18 THE VIDEOGRAPHER: Going off the record. The</p> <p>19 time is 10:09.</p> <p>20 (Recess from 10:09 a.m. until 10:13 a.m.)</p> <p>21 THE VIDEOGRAPHER: We're back on record. The</p> <p>22 time is 10:13.</p> <p>23 Q. (By Mr. Cain) Okay. Ms. Malkin, when we went</p> <p>24 off, we were talking about whether you recalled being at</p> <p>25 this July 20th rally in Denver with Mr. Oltmann.</p> <p>Page 9</p>

3 (Pages 6 - 9)

1 Do you recall anything about that?  
2 A. I'd have to know more about which rally that  
3 was. I attended several rallies during the summer. It  
4 was --  
5 Q. Okay. It -- it was a pro-police rally in Denver  
6 on July 20th.  
7 A. I don't recall seeing him there. I saw a lot of  
8 people. But I did attend that rally, yes.  
9 Q. When's the first time that you recall actually  
10 speaking to Mr. Oltmann then?  
11 A. At the interview that I did with him. I spoke  
12 with him at length during that interview.  
13 Q. Were you a listener to his podcast, The  
14 Conservative Daily, before you interviewed him?  
15 A. No.  
16 Q. Had you spoken at any FEC United functions prior  
17 to the interview?  
18 A. No.  
19 Q. Are you a member of that organization?  
20 A. I am not.  
21 Q. Were you aware of Mr. Oltmann's efforts to  
22 infiltrate Antifa prior to the interview he gave?  
23 A. Nope.  
24 Q. How did it come to be that he ended up on your  
25 live stream?

Page 10

1 A. I was contacted by a friend of mine,  
2 Randy Corporon. And then I followed him on Twitter. He  
3 was banned on Twitter the night before my live stream  
4 interview the next morning.  
5 Q. Mr. -- you mentioned Mr. Corporon. How do you  
6 know him?  
7 A. We travel in the same political circles. I have  
8 been on his radio show many time -- many times over  
9 the years.  
10 Q. When did he contact you about Mr. Oltmann?  
11 A. He said I should pay attention to his reporting  
12 on election integrity.  
13 Q. Was this in a phone call?  
14 A. It was initially by a -- a Signal message, and  
15 then I believe I had a short, brief conversation with him  
16 the next day.  
17 Q. What do you remember about that conversation?  
18 A. He told me that Joe Oltmann had done a podcast  
19 and that I should listen to it, and that I should explore  
20 more about what he had been reporting on.  
21 Q. Did you listen to the podcast?  
22 A. I saw some snippets of information that he had  
23 put up on Twitter, and I followed his Twitter account  
24 before it was suspended the day before my interview.  
25 Q. My question was, did you listen to the podcast?

Page 11

1 A. I listened to snippets of the podcast.  
2 Q. Was this a podcast relating to Eric Coomer?  
3 A. It was on election integrity issues. I can't  
4 recall specifically if he had mentioned Eric Coomer in the  
5 snippets that I had listened to.  
6 Q. Okay. So Mr. Corporon contacts you, says that  
7 you need to follow what Mr. Oltmann is doing regarding  
8 election integrity.  
9 You then followed Mr. Oltmann on Twitter, saw  
10 some snippets from his Twitter account, and listened to  
11 some snippets, as you put it, on Mr. Oltmann's podcast; is  
12 that correct?  
13 A. Correct.  
14 Q. Do you -- do you text with Mr. Corporon? You  
15 mentioned a Signal account.  
16 A. I have --  
17 Q. Do you text with him?  
18 A. I have texted with him, yes.  
19 Q. Okay. I want to share my screen with you,  
20 Ms. Malkin. There's going to be some exhibits that I've  
21 already premarked. We're running these -- these exhibits  
22 sequentially, so we have some exhibits that were already  
23 marked in Ms. Powell's deposition.  
24 We're going -- we're going to pick up  
25 numerically from there, just so counsel knows.

Page 12

1 The next exhibit that has been marked -- and  
2 it's in the marked exhibit folder -- is Exhibit 15. I've  
3 premarked Exhibit 15 through 30.  
4 And, Ms. Malkin, just for ease, I'm going to --  
5 I'm going to share my screen so that you can -- you can  
6 follow along at home.  
7 All right. Do you see what I'm seeing, which is  
8 Exhibit 25 to your deposition?  
9 (Exhibit Number 25 was introduced.)  
10 A. Yes.  
11 Q. (By Mr. Cain) This is a series of text messages  
12 that you produced; correct?  
13 A. These, I believe, are Signal. This is Signal.  
14 Q. Okay.  
15 A. So yes. I mean, it's a text message, yes.  
16 Q. Text through Signal.  
17 A. Correct.  
18 Q. All right. So you had Mr. Corporon's Signal  
19 account, like you mentioned, and on Thursday, November 12,  
20 at 12:57 p.m., it appears Mr. Corporon is sending you  
21 Joe Oltmann's contact information; is that correct?  
22 A. Correct.  
23 Q. And this would have been after your discussion  
24 with Mr. Corporon about following or paying attention to  
25 Mr. Oltmann; right?

Page 13



<p>1 A. I don't remember if it was before or after.</p> <p>2 Q. Okay. At or around the same time; fair?</p> <p>3 A. Yes. Uh-huh.</p> <p>4 Q. Okay.</p> <p>5 A. Yes.</p> <p>6 Q. And when did -- when did Mr. Oltmann ultimately</p> <p>7 go on your -- your live stream?</p> <p>8 A. It was a little bit after 10:00 in the morning</p> <p>9 the next day, Friday, November 13th.</p> <p>10 Q. Okay. So as of Thursday, November 12th, is</p> <p>11 there any other biographical information you knew about</p> <p>12 Mr. Oltmann other than what you've described to this</p> <p>13 point?</p> <p>14 MR. QUEENAN: Object to form.</p> <p>15 Q. (By Mr. Cain) And, Ms. Malkin, I don't know if</p> <p>16 you know this -- this process, but there will be</p> <p>17 objections occasionally to preserve the record. Unless</p> <p>18 your counsel instructs you not to answer the question,</p> <p>19 that's just to preserve the objection for the Court.</p> <p>20 You still need to respond to the question unless</p> <p>21 you don't understand it and I'll -- I'll --</p> <p>22 MR. QUEENAN: And, Ms. Malkin, in the future if</p> <p>23 I object, I'll say you can answer or can't answer.</p> <p>24 So you can answer.</p> <p>25 THE WITNESS: Okay.</p> <p>Page 14</p>	<p>1 Q. Do you still have those emails?</p> <p>2 A. I produced the emails, yes.</p> <p>3 Q. All right. Tell me what you learned from having</p> <p>4 a conversation, either through emails or otherwise, with</p> <p>5 Mr. Oltmann about what he was coming on your live stream</p> <p>6 to do or say.</p> <p>7 MR. QUEENAN: Object to form.</p> <p>8 You can answer.</p> <p>9 A. So I knew that he had been banned from Twitter,</p> <p>10 and I knew that he had been covering an angle related to</p> <p>11 Dominion Voting Systems, base -- which is a company based</p> <p>12 here in Colorado.</p> <p>13 Q. (By Mr. Cain) Okay. Anything else?</p> <p>14 A. That's what I recall.</p> <p>15 Q. Well, didn't you discuss with him what he was</p> <p>16 going to be talking about on your live stream before you</p> <p>17 went on?</p> <p>18 A. So this was essentially breaking news, because</p> <p>19 he had been banned on Twitter, and whatever information</p> <p>20 that he had been sharing, I was not privy to.</p> <p>21 And so I wanted to give him a platform to talk</p> <p>22 about what it is he knew that had caused him to be banned.</p> <p>23 Q. Okay. That -- that's the point of my question,</p> <p>24 ma'am. What did he tell you before he went on your live</p> <p>25 stream that he was going to talk about that caused him to</p> <p>Page 16</p>
<p>1 A. Sure. I knew that he was a local businessman, I</p> <p>2 knew that he was tech savvy, and I knew that he was a</p> <p>3 philanthropist and a grassroots conservative organizer who</p> <p>4 had been prominent in opposing the lockdowns here in</p> <p>5 Colorado, supporting the police, supporting local</p> <p>6 businesses, and religious liberty.</p> <p>7 Q. (By Mr. Cain) Okay. So someone that shared</p> <p>8 your political and philosophical views; fair?</p> <p>9 A. Yeah --</p> <p>10 MR. QUEENAN: Object to form.</p> <p>11 You can answer.</p> <p>12 A. Yes.</p> <p>13 Q. (By Mr. Cain) So after you received this</p> <p>14 contact information, did you reach out to Mr. Oltmann</p> <p>15 directly?</p> <p>16 A. Yes, but not immediately.</p> <p>17 Q. Okay. Tell me what you recall.</p> <p>18 A. I reached out to schedule a live stream</p> <p>19 interview with him, and it was after he had been banned</p> <p>20 from Twitter.</p> <p>21 Q. Okay. So you had a telephone discussion with</p> <p>22 Mr. Oltmann before he got on your live stream; true?</p> <p>23 A. I can't recall if it was a telephone</p> <p>24 conversation, but I know that I communicated with him by</p> <p>25 email.</p> <p>Page 15</p>	<p>1 be banned on Twitter?</p> <p>2 A. So I did not have an extensive preinterview with</p> <p>3 him, because I did not know what he knew. It was</p> <p>4 essentially a breaking live news story, similar to many of</p> <p>5 the previous live streams that I had broadcast throughout</p> <p>6 the election season.</p> <p>7 MR. CAIN: Objection. Nonresponsive.</p> <p>8 Q. (By Mr. Cain) Let -- let me ask you this way.</p> <p>9 Did you know before he came on your live stream that he</p> <p>10 was going to discuss a so-called Antifa conference call</p> <p>11 where he identified Eric Coomer as being someone who made</p> <p>12 a statement regarding fixing or rigging the 2020</p> <p>13 presidential election?</p> <p>14 A. I did not know what he was going to talk about.</p> <p>15 He did send me two zip files related to screenshots of</p> <p>16 Facebook posts that were posted, he says, by Eric Coomer,</p> <p>17 and that was the main focus and thrust of the interview.</p> <p>18 And we walked --</p> <p>19 Q. Okay. So you -- pardon me, ma'am. I'm sorry.</p> <p>20 A. And that's what we walked through on the live</p> <p>21 stream.</p> <p>22 Q. Okay. So you received from Mr. Oltmann zip</p> <p>23 files that contained private Facebook messages; is that</p> <p>24 correct?</p> <p>25 MR. QUEENAN: Object to form.</p> <p>Page 17</p>



<p>1 You can answer.</p> <p>2 A. He sent me zip files just as we were going to</p> <p>3 air, and they were Facebook messages that he attributed to</p> <p>4 Eric Coomer.</p> <p>5 Q. (By Mr. Cain) Okay. And did he tell you that</p> <p>6 this -- these Facebook messages were from a private</p> <p>7 account?</p> <p>8 MR. QUEENAN: Object to form and foundation.</p> <p>9 You can answer.</p> <p>10 A. He mentioned that they were from a Facebook</p> <p>11 account that was Eric Coomer's. And he mentioned in the</p> <p>12 interview, which there was a transcript of, that he had</p> <p>13 obtained them, he says, legally.</p> <p>14 MR. ZAKHEM: Are we still looking at this</p> <p>15 exhibit? Can we take that down, Counsel?</p> <p>16 MR. CAIN: Yeah. We're going to look at it in a</p> <p>17 little more depth.</p> <p>18 Q. (By Mr. Cain) Ms. Malkin, did you know before</p> <p>19 Mr. Oltmann came on your live stream whether or not the</p> <p>20 Facebook account messages were private or public? Did you</p> <p>21 know one way or the other?</p> <p>22 A. No.</p> <p>23 Q. And it's your sworn testimony that Mr. Oltmann</p> <p>24 did not, prior to appearing on your show, disclose to you</p> <p>25 that he was going to be talking about Mr. Coomer allegedly</p> <p style="text-align: right;">Page 18</p>	<p>1 A. No.</p> <p>2 Q. Going back to Exhibit 25, just building the</p> <p>3 timeline, this was on Thursday when you got Mr. Oltmann's</p> <p>4 contact information. Bookmark that for a second, since</p> <p>5 I'm just going to go sequentially on what you produced to</p> <p>6 us.</p> <p>7 The second page of this exhibit is a text or</p> <p>8 Signal text from someone named Lauren. It says: "Hey</p> <p>9 Michelle it's Lauren (previously from Hannity Radio). I</p> <p>10 am working with Sidney Powell and Don Brown</p> <p>11 (Clint Lorange's atty). We saw your interview with</p> <p>12 Joe Oltmann - absolutely incredible. They'd like to get a</p> <p>13 signed affidavit from Joe about Coomer and use his info in</p> <p>14 their federal complaint. Is there any way you can put us</p> <p>15 in touch?"</p> <p>16 Did I read that correctly?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. So this is obviously after the live</p> <p>19 stream occurred. Who is this Lauren that you were</p> <p>20 exchanging texts with?</p> <p>21 A. Lauren McLaughlin is a former producer for the</p> <p>22 Hannity radio show, and I believe at one time the TV show,</p> <p>23 who had booked for him and used to book interviews that I</p> <p>24 did for Hannity radio and, I believe, TV.</p> <p>25 Q. Okay. And at the time that you were exchanging</p> <p style="text-align: right;">Page 20</p>
<p>1 being on an Antifa conference call?</p> <p>2 A. I can't remember whether he mentioned that to me</p> <p>3 prior to our going live on air.</p> <p>4 Q. Well, what did you think he was coming on to</p> <p>5 say?</p> <p>6 A. I knew that he had been discussing Dominion</p> <p>7 Voting Systems, which is based here in Colorado, as a</p> <p>8 story of local interest. And because of everything that</p> <p>9 had happened postelection, I wanted to give him a platform</p> <p>10 to tell my audience exactly what he knew about it and why</p> <p>11 Eric Coomer's role might be of concern.</p> <p>12 I didn't know exactly what he was going to tell</p> <p>13 me, because after I had followed him on Twitter the day</p> <p>14 before, his account was deleted -- or rather -- let me</p> <p>15 amend that. He had been suspended from Twitter,</p> <p>16 permanently suspended.</p> <p>17 Q. I gotcha.</p> <p>18 So your testimony is you -- you really didn't</p> <p>19 have a specific idea of what Mr. Oltmann was going to say</p> <p>20 on your live stream before he came on; fair?</p> <p>21 A. Well, I assumed that he wanted to talk about the</p> <p>22 Facebook posts, because he sent two zip files of them as</p> <p>23 we were going to air.</p> <p>24 Q. Did he send you anything else besides the</p> <p>25 Facebook posts, ma'am?</p> <p style="text-align: right;">Page 19</p>	<p>1 these messages, who -- do you know who she was working</p> <p>2 with or for?</p> <p>3 A. Not until she told me. The last time I had any</p> <p>4 contact with her, as she mentioned, is the Clint Lorange</p> <p>5 case, which was a soldier who had been wrongfully</p> <p>6 convicted and then was released.</p> <p>7 Q. All right. Did you follow up with</p> <p>8 Ms. McLaughlin, putting them in touch; Joe Oltmann on the</p> <p>9 one hand, and Ms. McLaughlin on the other?</p> <p>10 A. I did.</p> <p>11 Q. What did you do?</p> <p>12 A. Gave the contact information from one to the</p> <p>13 other.</p> <p>14 Q. And that was the extent of it?</p> <p>15 A. Yep.</p> <p>16 Q. All right.</p> <p>17 On Sunday the 15th, this would have been</p> <p>18 two days after the live stream -- I don't have the full</p> <p>19 text. This is how it was produced to us. It looks like</p> <p>20 you're saying about "Connecting you with Joe ASAP." That</p> <p>21 means Joe Oltmann, as you just testified.</p> <p>22 "And I'll email one of his zip files. He has</p> <p>23 tons of screenshots and documents. Stand" -- I assume you</p> <p>24 said stand by.</p> <p>25 Did you send that information to Lauren</p> <p style="text-align: right;">Page 21</p>

1 McLaughlin?  
2 A. Yes.  
3 Q. And the information that you sent included  
4 screenshots, but you referenced documents. What -- what  
5 documents did you send Ms. McLaughlin?  
6 A. No documents. I think I just meant the --  
7 whatever was in the -- the zip file.  
8 Q. Okay. Which, as you recall, were the -- just  
9 the screenshots of the Facebook page?  
10 A. Right. Correct.  
11 Q. This goes on to say -- again, it's cut off, but  
12 this is what we have to work with: "Record his call with  
13 Antifa when Joe said he's taking care of the election;  
14 right? I couldn't tell if" -- and then it's cut off  
15 again.  
16 Do you recall what the exchange was here?  
17 A. I believe she was asking me did I know if  
18 Joe Oltmann had recorded the phone call.  
19 Q. Okay. Did you know that information as of the  
20 15th?  
21 A. No.  
22 Q. So you didn't -- you didn't ask Mr. Oltmann  
23 either during his live stream or during the preinterview  
24 process or any time thereafter whether he had a recording  
25 of this supposed Antifa conference call; is that true?

Page 22

1 A. You asked me two different questions.  
2 I did not ask him if he had recorded the phone  
3 call.  
4 Q. And you didn't think that was an important  
5 question to ask --  
6 MR. QUEENAN: Can I just (unintelligible) really  
7 quick?  
8 You mentioned that that text message is  
9 incomplete. I think the full version of that text message  
10 is Malkin Text 9.  
11 So to the extent that's helpful, we -- we did  
12 produce that full text message.  
13 MR. CAIN: Okay. Thank you, Gordon.  
14 Q. (By Mr. Cain) Ma'am, let's go back to my  
15 question. Did you ever ask Mr. Oltmann if he had a  
16 recording of the Antifa conference call?  
17 A. I did not.  
18 Q. And you didn't think that was important in terms  
19 of corroborating his version of this call?  
20 A. During the live stream, he described the phone  
21 call, and we then proceeded to go into detail about the  
22 Facebook screenshots.  
23 If he had a recording of the phone call, I  
24 think, at the time, he probably would have released it.  
25 MR. CAIN: Objection. Nonresponsive.

Page 23

1 Q. (By Mr. Cain) My question was --  
2 MR. QUEENAN: That's not nonresponsive. That is  
3 responsive.  
4 MR. CAIN: Well, that's not a -- that's an  
5 improper sidebar, Gordon. I'm making an objection for the  
6 record.  
7 MR. QUEENAN: You're making an improper  
8 objection. She's responding to your question. The fact  
9 that you don't like her answer doesn't make it  
10 nonresponsive.  
11 MR. CAIN: Well, if we're going to play it that  
12 way with the sidebars, then -- then so be it, Gordon. But  
13 I'm going to object for the record just like you will.  
14 Don't comment on my objections. If you don't like any of  
15 my objections --  
16 MR. QUEENAN: I just ask that you be respectful  
17 to me and the witness. That's all I'm asking.  
18 MR. CAIN: I'm being respectful. I'm making my  
19 objection as I see fit.  
20 MR. QUEENAN: That's fine.  
21 Q. (By Mr. Cain) So, ma'am, did you think to ask  
22 him about whether there was a recording of this call or  
23 not?  
24 A. I did not.  
25 Q. You -- you mentioned that Mr. Oltmann was tech

Page 24

1 savvy. Would you have expected him, if he was going to  
2 crash an Antifa conference call, to record it?  
3 MR. QUEENAN: Object to form.  
4 You can answer.  
5 A. You'd have to ask him about that.  
6 Q. (By Mr. Cain) You didn't find that curious  
7 yourself?  
8 A. Not in the context of him explaining why he was  
9 on the call in the first place, which he --  
10 Q. Right.  
11 A. -- went into detail in on my interview. He  
12 initially did not go on to that phone call thinking that  
13 there was going to be somebody of import to the election  
14 at the time, because he was investigating something  
15 entirely different.  
16 So, you know, unless he had some sort of magic  
17 ball, he -- he -- it wouldn't have occurred to him to --  
18 to do that. But, again, ask him about that, not me.  
19 Q. Well, I'm going to ask you what you know, and  
20 what you know seems to be from him. So let's -- let's  
21 continue this line of questioning.  
22 Did you talk to him before he went on your live  
23 stream about how he was able to access this Antifa  
24 conference call?  
25 A. I did not.

Page 25

<p>1 Q. Did you ever ask him if he had credentials to 2 access it or if he used a conduit to get on to the call? 3 A. What I -- 4 MR. QUEENAN: Object to form. 5 You can answer. 6 A. What I knew about how he came on to the phone 7 call, what he was doing there, what he discovered, and why 8 he realized it was important only became clear to me as we 9 were doing the interview. That was the reason for doing 10 the interview in the first place. 11 Q. (By Mr. Cain) So I'm scrolling down just to try 12 to get through this exhibit. This is some more of your 13 email chain with Ms. McLaughlin. It looks like she 14 provided you with her Gmail account so you could send the 15 information you had gotten from Mr. Oltmann; is that true? 16 MR. QUEENAN: Object to form. 17 A. Yes. 18 Q. (By Mr. Cain) Okay. And here's what your 19 counsel was talking about. This is the full message from 20 Ms. McLaughlin. 21 All right. And I went through that just to get 22 back to your communications with Mr. Oltmann. 23 We saw earlier, you got the -- the contact 24 information from Mr. Corporon on the 12th, sometime 25 shortly after noon, and then looks like later on the 12th,</p> <p style="text-align: right;">Page 26</p>	<p>1 Q. (By Mr. Cain) Do you -- as of this period of 2 time on November 13th, do you -- do you have any 3 recollection as to why Twitter was suspending accounts 4 such as Mr. Oltmann's? 5 A. In general, my recollection is that many users 6 who were tweeting about election integrity were getting 7 suspended or banned. 8 Q. And you know it was because -- or Twitter has 9 said that it's because the information that was being 10 disseminated by these Twitter account holders was either 11 misinformation, disinformation, or flat false. 12 You know that; right? 13 A. Yes -- 14 MR. QUEENAN: Object to form and foundation. 15 A. Yes, I do. 16 Q. (By Mr. Cain) So Mr. Oltmann goes on to say 17 that Twitter suspended his account, and that he filed an 18 affidavit with the Trump administration, and the death 19 threat's rolled in. 20 Let me -- let me pause there. Had you, at this 21 point, had any communications with anyone with the Trump 22 campaign regarding election integrity issues? 23 A. No. 24 Q. Do you know whether Ms. McLaughlin was working 25 for the Trump campaign?</p> <p style="text-align: right;">Page 28</p>
<p>1 at 1:55 p.m., Mr. Oltmann kind -- is in touch with you. 2 Is that -- is that how it happened? 3 A. Yes. 4 Q. Okay. So 1:55 the day before the live stream: 5 "Hi, Michelle. This is Joe Oltmann. Hoping to connect 6 with you at some point. I'm not usually the public person 7 but the calls and emails are pouring in." 8 It looks like then you respond: "Hi, Joe." 9 This is the afternoon before the live stream. "Great work 10 you are doing. Let's touch base tomorrow. If you are up 11 for a live stream in the afternoon, that would be great." 12 And then it doesn't look like, and -- and 13 correct me if this -- if your memory is different, but it 14 doesn't look like you got confirmation that Mr. Oltmann 15 would appear on your live stream until early in the 16 morning of Friday, November 13th; is that correct? 17 A. Yes. 18 Q. So this was a fairly precipitous booking on to 19 your live stream. Is that a fair characterization? 20 MR. QUEENAN: Object -- I apologize. Object to 21 form. 22 A. Yes. So as I stated, it was the suspension of 23 his Twitter account that raised the news urgency of having 24 him on my show to talk about what it is that got him 25 suspended.</p> <p style="text-align: right;">Page 27</p>	<p>1 A. No. 2 Q. Had you had any discussions with either 3 Ms. Sidney Powell or Mr. Giuliani as of this point in time 4 regarding election integrity issues? 5 A. No. 6 MR. QUEENAN: Object to form. 7 A. No. 8 Q. (By Mr. Cain) Okay. So Mr. Oltmann confirm -- 9 confirms that he'll be a guest on your live stream, it 10 appears, early that morning. Again, around 4:43 a.m. And 11 then at 6:21 -- this is your response; right? 12 A. Correct. 13 Q. Okay. 14 "Very crazy. Thanks for standing up. Can you 15 do a live stream at 10:00 a.m.?" 16 "Yes, I can." 17 "Okay, great. I use a platform called 18 StreamYard." 19 And then you go into, essentially, the nuts and 20 bolts of how to do the live stream; right? 21 A. Correct. 22 Q. So is it -- is it fair to say that at this 23 point, you really hadn't had the time to thoroughly vet 24 Mr. Oltmann's story as to what he was going to come on to 25 your live stream to say. Is that true?</p> <p style="text-align: right;">Page 29</p>

<p>1 MR. QUEENAN: Object to form.</p> <p>2 A. Yes. Whatever information I could have gleaned</p> <p>3 the night before or the morning of, I was denied that</p> <p>4 information because his Twitter account was nuked.</p> <p>5 Q. (By Mr. Cain) Okay. And just to be clear, did</p> <p>6 you have an inkling that part of what Mr. Oltmann was</p> <p>7 coming on your live stream to talk about included this</p> <p>8 person named Eric Coomer, who worked for Dominion Voting</p> <p>9 Systems?</p> <p>10 A. In general, yes.</p> <p>11 Q. Okay. And did you -- prior to this point in</p> <p>12 time, had you heard of Mr. Coomer?</p> <p>13 A. Prior to the election, or prior to the -- the --</p> <p>14 Q. Your live stream.</p> <p>15 A. I believe his -- I believe I had seen the name</p> <p>16 the day before on Twitter.</p> <p>17 Q. Okay. On -- do you remember the account?</p> <p>18 A. No. I -- I follow thousands of people on</p> <p>19 Twitter.</p> <p>20 Q. Right. And you have, what, two million</p> <p>21 followers on your Twitter account?</p> <p>22 A. Something like that, yes.</p> <p>23 Q. As of this point in time that we're talking</p> <p>24 about, November of 2020, just after the election, you had</p> <p>25 around two million followers; true?</p> <p>Page 30</p>	<p>1 I did not think of -- I -- I did not think one</p> <p>2 way or another about whether he was a private or public</p> <p>3 figure.</p> <p>4 Q. Okay. Do you have a -- a belief one way or the</p> <p>5 other as you sit here, as of the time of your live stream,</p> <p>6 did you consider him to be a public figure, Mr. Coomer?</p> <p>7 MR. QUEENAN: Object to form and foundation.</p> <p>8 A. I considered him to be a figure of public</p> <p>9 interest, which is why I held the live stream in the first</p> <p>10 place.</p> <p>11 Q. (By Mr. Cain) Well, we -- we looked at the lead</p> <p>12 up to this, and it appears from your timestamps on your</p> <p>13 emails that you confirmed that Mr. Oltmann would appear on</p> <p>14 your live stream about three and a half hours before</p> <p>15 you -- you went live.</p> <p>16 Is that accurate, just temporally?</p> <p>17 A. Sure.</p> <p>18 Q. Okay. And then you had received shortly before</p> <p>19 the live stream a -- a group of Facebook screenshots.</p> <p>20 Had you talked to Mr. Oltmann before he went on</p> <p>21 your live stream about how he actually got access to those</p> <p>22 screenshots? I know you said he -- he said it was legal.</p> <p>23 But did he disclose to you how he got access?</p> <p>24 MR. QUEENAN: Object to form, and I think asked</p> <p>25 and answered.</p> <p>Page 32</p>
<p>1 A. Yes.</p> <p>2 Q. Okay. But to Mr. Coomer, my question was, other</p> <p>3 than what you may have seen on that one Twitter account,</p> <p>4 you really had no biographical information on him, didn't</p> <p>5 know who he was, what he did; fair?</p> <p>6 MR. QUEENAN: Object to form.</p> <p>7 You can answer.</p> <p>8 A. I did not.</p> <p>9 Q. (By Mr. Cain) And you didn't consider -- you</p> <p>10 didn't know him to be a public figure such as yourself;</p> <p>11 true?</p> <p>12 MR. QUEENAN: Object to form and foundation.</p> <p>13 A. I knew that he was a high-profile executive at</p> <p>14 Dominion Voting Systems.</p> <p>15 Q. (By Mr. Cain) Okay. Which is a private</p> <p>16 company; right?</p> <p>17 A. Yes.</p> <p>18 Q. All right. But did you consider Mr. Coomer to</p> <p>19 be a public figure at the time that your live stream</p> <p>20 went -- went on air on the -- on the following day, on</p> <p>21 Friday?</p> <p>22 MR. QUEENAN: Object to form.</p> <p>23 Q. (By Mr. Cain) Do you know, ma'am?</p> <p>24 A. Yes. Well, I'm -- I'm just thinking about the</p> <p>25 question, if that's okay.</p> <p>Page 31</p>	<p>1 Go ahead and answer.</p> <p>2 A. You did ask it previously, and I did answer</p> <p>3 that, no, we did not discuss that prior to going live on</p> <p>4 air.</p> <p>5 And as I had mentioned earlier, I received the</p> <p>6 zip files as we were -- literally as we were going live on</p> <p>7 air.</p> <p>8 Q. (By Mr. Cain) You know, though, that -- that</p> <p>9 individuals can make their Facebook pages public or</p> <p>10 private; right?</p> <p>11 MR. QUEENAN: Object to form.</p> <p>12 A. They can close them off, yes, to groups of -- of</p> <p>13 people, yes.</p> <p>14 Q. (By Mr. Cain) Okay. And did you inquire about</p> <p>15 that? That was the point of my question. Did you inquire</p> <p>16 whether this was a closed-off-to-the-public Facebook page?</p> <p>17 A. As I mentioned, I did not ask about that.</p> <p>18 Q. Do you have a -- do you have a private Facebook</p> <p>19 page?</p> <p>20 MR. QUEENAN: Object to form and found- -- well,</p> <p>21 actually, relevance. What does this have to do with</p> <p>22 actual malice or any of this -- the issues in the -- in</p> <p>23 the litigation? Is it just about her knowledge of</p> <p>24 Facebook generally?</p> <p>25 MR. CAIN: No, it's -- it's not. It's more</p> <p>Page 33</p>



<p>1 specific than that. And -- and we have more than, of</p> <p>2 course, the defamation claim.</p> <p>3 Your client was publishing private Facebook</p> <p>4 pages on her live stream. That's what I'm inquiring</p> <p>5 about.</p> <p>6 MR. QUEENAN: That's got nothing to do with --</p> <p>7 Q. (By Mr. Cain) Do you have a private Facebook</p> <p>8 account --</p> <p>9 MR. QUEENAN: -- having a private Facebook</p> <p>10 account.</p> <p>11 Q. (By Mr. Cain) Do you have a private Facebook</p> <p>12 account, ma'am?</p> <p>13 A. No, I don't.</p> <p>14 Q. As for Mr. Coomer, or Dr. Coomer, you mentioned</p> <p>15 that you knew he was a high-profile executive at Dominion</p> <p>16 Did you have time to do any research about him before</p> <p>17 putting Mr. Oltmann on your live stream?</p> <p>18 A. No.</p> <p>19 Q. And had you done any independent research --</p> <p>20 this was, of course, after the election, but had you done</p> <p>21 any independent research about Dominion Voting Systems</p> <p>22 before this live stream?</p> <p>23 MR. QUEENAN: Object to form.</p> <p>24 A. Yes.</p> <p>25 Q. (By Mr. Cain) Okay. Walk me through that.</p> <p style="text-align: right;">Page 34</p>	<p>1 see if I can pull that. Bear with me.</p> <p>2 THE VIDEOGRAPHER: And, Ms. Malkin, this is the</p> <p>3 videographer. If you could just delay your response a</p> <p>4 little bit to give your counsel a chance to object if he</p> <p>5 wants to, it will make it a much cleaner record for the</p> <p>6 court reporter.</p> <p>7 THE WITNESS: Yeah. Sorry about that.</p> <p>8 MR. QUEENAN: I'm sorry, Dennis.</p> <p>9 Q. (By Mr. Cain) All right. Ms. Malkin, I'm</p> <p>10 showing you what has been electric- -- electronically</p> <p>11 marked as Exhibit 15.</p> <p>12 (Exhibit Number 15 was introduced.)</p> <p>13 Q. (By Mr. Cain) This is, I'll just represent to</p> <p>14 you, the live stream that we've been talking about that</p> <p>15 was on Friday, November 13th.</p> <p>16 Are you with me?</p> <p>17 A. Yes.</p> <p>18 MR. QUEENAN: Charlie, before we go any further,</p> <p>19 I have -- I have you marking the text messages as 15.</p> <p>20 Should this be 16, or did I have the text messages wrong?</p> <p>21 MR. CAIN: Yeah. The texts were 25. I may have</p> <p>22 misspoken --</p> <p>23 MR. QUEENAN: Okay.</p> <p>24 MR. CAIN: -- the texts. And they're -- and</p> <p>25 like I said, they're on the Exhibit Share. But to be</p> <p style="text-align: right;">Page 36</p>
<p>1 What research had you done and when?</p> <p>2 A. Over the course of 30 years, I've been</p> <p>3 interested in many aspects of election integrity, and</p> <p>4 electronic voting systems has reared its head as a -- as</p> <p>5 an election issue for as long as I've been a political</p> <p>6 journalist.</p> <p>7 And although it wasn't a -- as keen a focus of</p> <p>8 mine in -- in 2020, I had watched documentaries on</p> <p>9 electronic voting systems. Dominion's name had come up in</p> <p>10 general. And there had been concerns across the</p> <p>11 ideological spectrum about the potential for shenanigans</p> <p>12 and fraud and -- and hacking of these types of systems in</p> <p>13 the United States and around the world.</p> <p>14 Q. But let's -- let's focus on the time period</p> <p>15 around the 2020 presidential election, shortly before</p> <p>16 and -- and thereafter, before your live stream.</p> <p>17 Had you taken a closer look at Dominion Voting</p> <p>18 Systems specifically beyond what you've described?</p> <p>19 MR. QUEENAN: Object to --</p> <p>20 A. No. Oh.</p> <p>21 MR. QUEENAN: I'll withdraw the objection.</p> <p>22 THE WITNESS: Okay.</p> <p>23 A. No.</p> <p>24 Q. (By Mr. Cain) Okay. So he comes -- he,</p> <p>25 Mr. Oltmann, comes on your -- your live stream. Let me</p> <p style="text-align: right;">Page 35</p>	<p>1 clear, the texts were 25, and this is Exhibit 15.</p> <p>2 MR. QUEENAN: Okay. I apologize. Thanks for</p> <p>3 clarifying.</p> <p>4 Q. (By Mr. Cain) Ms. Malkin, we're going to look</p> <p>5 just a little bit at some sections of your live stream.</p> <p>6 Okay?</p> <p>7 A. Okay.</p> <p>8 (The video segment was played.)</p> <p>9 Q. (By Mr. Cain) All right. I'm going to pause</p> <p>10 there.</p> <p>11 So you say that you're bringing information</p> <p>12 vital to the understanding of the "systemic stealing of</p> <p>13 the election." We just heard that.</p> <p>14 At this point in time, what were you referring</p> <p>15 to when you're telling your audience that you're bringing</p> <p>16 information regarding the "systemic stealing of the</p> <p>17 election"?</p> <p>18 A. Yeah. I think broadly defined, the "stealing of</p> <p>19 the election" took many forms. And over the course of</p> <p>20 many of these live streams that I did, as I mentioned in</p> <p>21 the introductory remarks, it paints a picture of election</p> <p>22 integrity that was undermined by many forces.</p> <p>23 And so the prime focus of mine was a nonprofit</p> <p>24 called the Center for Tech and Civic Life, which was</p> <p>25 heavily funded by Mark Zuckerberg.</p> <p style="text-align: right;">Page 37</p>

<p>1 But that's just one aspect of it. I've covered 2 election fraud, as I mentioned, over the last 30 years. 3 And it's the entire mountain of everything from 4 illegal-alien fraud, fraud that was catalyzed by the motor 5 voter law, its obstruction of GOP poll workers. 6 And I had interviewed one of them in Michigan. 7 It had to do with a -- a lot of the training that I 8 believe was done by partisan figures and electronic voting 9 systems and the weaknesses and the -- the problems with 10 those, which have been highlighted by, as I said, people 11 on both the left and the right, is part of that larger 12 picture of the stealing of an election. 13 Q. And that's how you framed the story that you 14 were doing on -- on Eric Coomer on this live stream, 15 though; that he -- that this was part of this systemic 16 stealing of the election; true? 17 A. Correct. 18 Q. And you wanted the viewers to know that -- that 19 Eric Coomer was potentially instrumental in the stealing 20 of the 2020 presidential election; true? 21 A. I wanted people to hear what Joe Oltmann had 22 discovered about him, and why he felt it was important and 23 germane to the public discussion of how the election was 24 run, yes. 25 Q. Okay. And you didn't talk about -- I mean, this</p> <p style="text-align: right;">Page 38</p>	<p>1 conclude that he was going to raise red flags about 2 Eric Coomer's role as -- as an executive in that company, 3 which, as I said in my prefatory remarks, had been in the 4 headlines and was of concern to my audience. 5 MR. QUEENAN: I apologize, everybody. My Zoom 6 crashed about three minutes ago. 7 MR. CAIN: She just confessed to the crime. 8 MR. QUEENAN: Then I object to form and 9 foundation. 10 Are we -- I'm sorry. I assume we're still on 11 the record? 12 MR. CAIN: We've been on the record, Gordon. 13 And I don't know what to do to -- to cure that. I'll give 14 you the option, if you want, during the last four minutes 15 to interject to form, objection after the facts, if you 16 want to review the transcript. 17 MR. QUEENAN: That sounds great. 18 MR. CAIN: Let's move on -- 19 MR. QUEENAN: Yeah. 20 Q. (By Mr. Cain) Let's move on, Ms. Malkin. 21 We're at 1:04 in your live stream with 22 Mr. Oltmann. You bring him on. And -- and I assume this 23 is the first time you remember, like, seeing him. Didn't 24 sound like you had -- 25 A. It is --</p> <p style="text-align: right;">Page 40</p>
<p>1 entire live stream was devoted to Eric Coomer, was it not? 2 A. It was, because that's the information 3 Joe Oltmann had to bring to the table. 4 Q. Right. Well, you mentioned Zuckerberg and -- 5 and a bunch of other things that you had been reporting 6 on. 7 But in -- in the context of this live stream 8 that you framed as the "systemic stealing of the election" 9 as being the topic, Eric Coomer was the only person you 10 were talking about on this day; right? 11 A. On this day, it was. But I think the context of 12 the series of live streams that I had done, which my many 13 viewers on YouTube and Twitter and Facebook had followed, 14 understood that it was a bigger picture, an -- an entire 15 umbrella of election integrity irregularities and concerns 16 that spelled the stealing of an election, yes. I believe 17 that they understood when I prefaced my remarks that 18 that's what I was talking about. 19 Q. All right. But as you've testified, ma'am, you 20 didn't know what Mr. Oltmann was going to say about 21 Dr. Coomer before he went on your show. All you had was 22 his Facebook posts; right? 23 A. So I had in my possession the Facebook posts. 24 Certainly knowing who Joe Oltmann was and that he had been 25 covering concerns about Dominion, I think it was fair to</p> <p style="text-align: right;">Page 39</p>	<p>1 Q. -- you knew what you were looking at before now. 2 A. Correct. 3 Q. Okay. 4 (The video segment was played.) 5 Q. (By Mr. Cain) I noticed -- I'll stop there. 6 Mr. Oltmann mentions this FEC United, and I -- I know I 7 asked you about that organization before. 8 Did you know when he was coming on your live 9 stream that he was going to be talking about FEC United? 10 A. Well, he heads it, so I assumed, yes, that he 11 would. 12 Q. And it looked like -- I don't know how your 13 program works for your live streams, but it looks like 14 when he mentions it, you -- you have the ability and did 15 throw that up on the screen. Is that true? 16 A. Yeah. I do that for most of my guests if they 17 have an organization or whatnot, to put it in the lower 18 third or the chyron. 19 Q. Yeah. It helps get information or, at least, 20 the identity of the organization out to the public; fair? 21 A. Yes. 22 Q. There's some prefatory statements here. I'll 23 try to fast forward. 24 I want to go into -- I think this section is 25 when he talks more specifically about this Eric Coomer</p> <p style="text-align: right;">Page 41</p>

<p>1 story.</p> <p>2 (The video segment was played.)</p> <p>3 Q. (By Mr. Cain) I'm going to stop there.</p> <p>4 So the week of the 27th of September is when</p> <p>5 Mr. Oltmann indicated that he was on this Antifa</p> <p>6 conference call.</p> <p>7 Is that -- is that your recollection, ma'am?</p> <p>8 A. That's what he said.</p> <p>9 Q. Okay. So that would have been, you know, over a</p> <p>10 month before the election itself; true?</p> <p>11 A. Correct.</p> <p>12 Q. And -- and this is now after the election, and</p> <p>13 he's making it public on your show what he had learned</p> <p>14 back in September prior to the election; fair?</p> <p>15 A. Yes.</p> <p>16 Q. And in your preinterview -- well, you've --</p> <p>17 you've talked about the limited discussion. Did it strike</p> <p>18 you at all when you were listening to this as to the</p> <p>19 timing of all of this? Why he was just now bringing up</p> <p>20 this alleged call when it occurred back in September?</p> <p>21 MR. QUEENAN: Object to form.</p> <p>22 A. Well, if you keep playing it, he explains why it</p> <p>23 didn't occur to him until later to connect the dots.</p> <p>24 Q. (By Mr. Cain) All right.</p> <p>25 (The video segment was played.)</p> <p style="text-align: right;">Page 42</p>	<p>1 could be corroborated by other sources? Is that going</p> <p>2 through your head?</p> <p>3 A. I'm giving him a platform to tell me what he</p> <p>4 knows, and I wanted to listen to what he had to say. And</p> <p>5 I believed it was important for my audience to be able to</p> <p>6 hear what he had to say because he had been censored on</p> <p>7 Twitter from saying it.</p> <p>8 MR. CAIN: Objection. Nonresponsive.</p> <p>9 Q. (By Mr. Cain) Let -- let me ask you this way.</p> <p>10 Do you believe that you have a responsibility as a</p> <p>11 journalist to put verifiable facts out, facts that can be</p> <p>12 verified?</p> <p>13 MR. QUEENAN: Object to form and foundation.</p> <p>14 A. I believe that I have an imperative to broadcast</p> <p>15 stories that are not being covered and to give a platform</p> <p>16 to people who are being censored for disseminating what is</p> <p>17 considered dangerous or dissident information but that is</p> <p>18 of high public interest. And election integrity certainly</p> <p>19 was at that particular time and now.</p> <p>20 MR. CAIN: Objection. Nonresponsive.</p> <p>21 Q. (By Mr. Cain) My -- my question was maybe a</p> <p>22 little bit different --</p> <p>23 A. I did respond.</p> <p>24 Q. Let me repeat it.</p> <p>25 A. I did respond to you. I said -- I said what I</p> <p style="text-align: right;">Page 44</p>
<p>1 Q. (By Mr. Cain) I'm going to pause there.</p> <p>2 You learned, I guess, for the first time here,</p> <p>3 that someone named Eric from Dominion was on this call.</p> <p>4 But there was no -- as you heard, there was no mention</p> <p>5 that it was an Eric Coomer; true?</p> <p>6 A. Right. But then, as I recall from doing the</p> <p>7 interview, he explains how it is that he connected those</p> <p>8 dots.</p> <p>9 Q. Right. And -- and we'll get to that.</p> <p>10 But --</p> <p>11 A. Right.</p> <p>12 Q. -- it's a fair statement that the allegation</p> <p>13 that Mr. Oltmann was making was that he was on a call.</p> <p>14 And at the time, there was no -- no identification beyond</p> <p>15 Eric of Dominion; right?</p> <p>16 A. At this point, no.</p> <p>17 Q. All right. And he also mentioned that he was</p> <p>18 taking copious notes. You heard that; right?</p> <p>19 A. Yes.</p> <p>20 Q. Did you ever ask to see the notes that he took</p> <p>21 of this Antifa conference call?</p> <p>22 A. No.</p> <p>23 (The video segment was played.)</p> <p>24 Q. (By Mr. Cain) Now, at this point in your live</p> <p>25 stream, ma'am, are you thinking about whether this story</p> <p style="text-align: right;">Page 43</p>	<p>1 had an obligation to do as a journalist, yes.</p> <p>2 Q. Did you have a responsibility as a journ--</p> <p>3 journalist to publish on your -- on your live stream or on</p> <p>4 your show verifiable facts? Yes or no?</p> <p>5 MR. QUEENAN: Object to form.</p> <p>6 A. If I were held to a standard of only live</p> <p>7 streaming facts what I could verify beforehand, I would be</p> <p>8 restrained from doing any live streams at all; and so, for</p> <p>9 that matter, would any outlet that covers breaking news or</p> <p>10 live streams.</p> <p>11 Q. (By Mr. Cain) Well, you -- we'll talk about it</p> <p>12 in a minute, ma'am.</p> <p>13 But you -- you -- you replayed, not then</p> <p>14 replayed -- you had another interview a couple of weeks</p> <p>15 with Mr. Oltmann after this; right?</p> <p>16 A. Correct.</p> <p>17 Q. And by that point, it wasn't breaking news, was</p> <p>18 it?</p> <p>19 A. Those were completely two different forms of</p> <p>20 journalism. This is a live stream that was conducted by</p> <p>21 myself independently, and the follow-up program was on a</p> <p>22 corporate news channel, as you know.</p> <p>23 Q. I do know.</p> <p>24 Is it your view, then, ma'am, if you're</p> <p>25 conducting a live stream with, as you call it, breaking</p> <p style="text-align: right;">Page 45</p>

<p>1 news, that you have no responsibility to verify the</p> <p>2 factual accuracy of the person that's making the</p> <p>3 statements?</p> <p>4 MR. QUEENAN: Object to form and foundation.</p> <p>5 A. I always do my best to report the truth in</p> <p>6 whatever platform or medium I am on.</p> <p>7 Q. (By Mr. Cain) Well, you started off your live</p> <p>8 stream by saying that you're reporting on the systemic</p> <p>9 stealing of the election, but we've already established</p> <p>10 you didn't even know what he was going to say on your live</p> <p>11 stream.</p> <p>12 MR. QUEENAN: Object to form and foundation.</p> <p>13 Q. (By Mr. Cain) You didn't know what he was going</p> <p>14 to say; true?</p> <p>15 A. I had a general idea that he was going to talk</p> <p>16 about red flags that he was raising about Dominion that</p> <p>17 got him suspended from Twitter.</p> <p>18 Q. What if what he was saying was false, ma'am? Do</p> <p>19 you have a responsibility as a journalist, even if it's</p> <p>20 breaking news, to -- to correct the record if false facts</p> <p>21 are said in this context?</p> <p>22 MR. QUEENAN: Object to form and foundation.</p> <p>23 A. I do correct the record if it comes to light</p> <p>24 that what I have said or broadcast is false.</p> <p>25 Q. And that's -- that's an -- that's an ethical</p> <p style="text-align: right;">Page 46</p>	<p>1 A. I said, "Sure."</p> <p>2 Q. Okay.</p> <p>3 And you actually -- I mean, you were a print</p> <p>4 journalist for a while, were you not?</p> <p>5 MR. QUEENAN: Object to form.</p> <p>6 Q. (By Mr. Cain) And you worked for a newspaper,</p> <p>7 maybe even more than one; right?</p> <p>8 A. I'm a multimedia journalist. I started out my</p> <p>9 career as an intern in Washington, D.C., for NBC News,</p> <p>10 when Tim Russert was the Washington bureau chief. I</p> <p>11 worked for two major metropolitan newspapers, the</p> <p>12 L.A. Daily News and the Seattle Times.</p> <p>13 I've had a nationally syndicated newspaper</p> <p>14 column since 1999. I've worked for a number of cable TV</p> <p>15 stations, written seven books, and founded two internet</p> <p>16 news companies.</p> <p>17 Q. So you're more than familiar, based on that</p> <p>18 experience, in the standards relating to journalistic</p> <p>19 reporting; right?</p> <p>20 A. Yes.</p> <p>21 MR. HICKS: Object to form.</p> <p>22 Q. (By Mr. Cain) Things like corroborating</p> <p>23 sources, when and if to use anonymous sources, those sort</p> <p>24 of standard journalistic practices; right?</p> <p>25 A. Yes.</p> <p style="text-align: right;">Page 48</p>
<p>1 duty that a journalist has; right? That's a fair</p> <p>2 statement, isn't it?</p> <p>3 A. Yes.</p> <p>4 MR. QUEENAN: Object to form and foundation.</p> <p>5 A. Yes.</p> <p>6 Q. (By Mr. Cain) And don't you agree with me that</p> <p>7 if -- if you're verifying facts that you're putting out</p> <p>8 into the public discourse and you're being transparent</p> <p>9 with your audience, that that is a way that a journalist</p> <p>10 can eliminate the potential for bias?</p> <p>11 MR. QUEENAN: Object to form.</p> <p>12 Q. (By Mr. Cain) Do you agree with that statement?</p> <p>13 A. Can you repeat the question?</p> <p>14 Q. Yeah. I'll -- I'll do it in a shorter form.</p> <p>15 Verification and transparency in reporting</p> <p>16 eliminates or reduces bias in reporting.</p> <p>17 A. Sure.</p> <p>18 MR. QUEENAN: Object to form and foundation.</p> <p>19 Q. (By Mr. Cain) That's -- that's a basic tenant</p> <p>20 of journalism, isn't it?</p> <p>21 MR. QUEENAN: Object to form and foundation.</p> <p>22 Q. (By Mr. Cain) Did you answer? You were talking</p> <p>23 over a little bit.</p> <p>24 A. I did.</p> <p>25 Q. Okay. And your answer was "Yes"; right?</p> <p style="text-align: right;">Page 47</p>	<p>1 Q. Right. And as you sit here -- and we listened</p> <p>2 to some of your live stream -- did you hear anything in</p> <p>3 what Mr. Oltmann was saying that indicated to you that</p> <p>4 this could be corroborated --</p> <p>5 MR. QUEENAN: Object --</p> <p>6 Q. (By Mr. Cain) -- his story?</p> <p>7 MR. QUEENAN: Object to form.</p> <p>8 A. So as the live stream unfolded, I was listening</p> <p>9 to his firsthand account of what he says that he heard,</p> <p>10 and then what he saw in a very large series of screenshots</p> <p>11 of Facebook posts whose authenticity has not been</p> <p>12 questioned.</p> <p>13 Q. (By Mr. Cain) Okay. Well, I'm -- I'm talking</p> <p>14 about the story that he gave you.</p> <p>15 A. And part of the -- a huge part of the story and</p> <p>16 the bulk of what we talked about in our live stream were</p> <p>17 the screenshots that he had obtained that were attributed</p> <p>18 to Eric Coomer.</p> <p>19 Q. Okay. And we'll -- we'll get to those, ma'am.</p> <p>20 Let's not put the cart before the horse.</p> <p>21 What I'm -- what I'm asking you about, you heard</p> <p>22 what he was saying. Did you hear anything with your</p> <p>23 journalistic ear that gave you some clues as how -- as to</p> <p>24 how you might corroborate that story that he was telling</p> <p>25 you?</p> <p style="text-align: right;">Page 49</p>



<p>1 MR. QUEENAN: Object to form.</p> <p>2 A. At the time of the live stream, my main focus</p> <p>3 was in giving him a platform to tell me and to tell my</p> <p>4 audience what he knew about Eric Coomer and to share</p> <p>5 information that he had gathered about Eric Coomer's bias,</p> <p>6 because that bias was pertinent to people's understanding</p> <p>7 and perspective of Dominion Voting Systems.</p> <p>8 Q. (By Mr. Cain) What do you mean by "bias"?</p> <p>9 What -- what "bias" are you referring to?</p> <p>10 A. I'm talking about the substance of the Facebook</p> <p>11 posts in which Eric Coomer manifested an extreme bias</p> <p>12 against Donald Trump, against his supporters, against the</p> <p>13 police, and many other people who are ideologically</p> <p>14 similar to Joe Oltmann and myself.</p> <p>15 Q. Well, what -- what if he was a -- a -- let's</p> <p>16 just run with what you're saying.</p> <p>17 What if -- what if Mr. -- or Dr. Coomer was a</p> <p>18 vehement supporter of Donald Trump? Are you saying that</p> <p>19 an election worker can't have a political viewpoint?</p> <p>20 MR. QUEENAN: Object to form.</p> <p>21 Q. (By Mr. Cain) I'm trying to understand the</p> <p>22 relevance of -- of this.</p> <p>23 A. Sure. I'd -- I'd be glad to explain it.</p> <p>24 Eric Coomer was a high-profile, highly placed</p> <p>25 executive at Dominion Voting Systems, not just a</p> <p style="text-align: right;">Page 50</p>	<p>1 So if that's true, then -- then how are you</p> <p>2 sitting here linking a political viewpoint with one's</p> <p>3 ability to administer or serve in a -- in an election</p> <p>4 role? I don't get it.</p> <p>5 MR. QUEENAN: Object to form.</p> <p>6 You can answer.</p> <p>7 A. What's the question?</p> <p>8 Q. (By Mr. Cain) Who cares? Maybe he didn't like</p> <p>9 Donald Trump. What does that have to do with election</p> <p>10 integrity?</p> <p>11 A. Joe Oltmann explains why he believes it is</p> <p>12 relevant, and I agree with him; that it is concerning that</p> <p>13 the sheaf of Facebook posts that not merely express some</p> <p>14 di minimus level of discontent but are actually very</p> <p>15 extreme and profane in vitreal and even hatred for people</p> <p>16 who are on the right, is of great public interest to</p> <p>17 voters who were concerned about how Election 2020 was</p> <p>18 conducted.</p> <p>19 Q. And so that's why you chose to -- to put up the</p> <p>20 Facebook posts during this live stream?</p> <p>21 MR. QUEENAN: Object to form.</p> <p>22 Q. (By Mr. Cain) Is that why?</p> <p>23 A. Yes. Eric Coomer was a high-level official for</p> <p>24 Dominion Voting Systems whose products are used in almost,</p> <p>25 what, 30 states in the country. Dominion was at the</p> <p style="text-align: right;">Page 52</p>
<p>1 rank-and-file election worker.</p> <p>2 And I wanted to bring this information that</p> <p>3 Joe Oltmann had obtained to my audience so that they could</p> <p>4 make determinations for themselves about how concerned to</p> <p>5 be about Eric Coomer and his role at Dominion.</p> <p>6 Q. Well, he's entitled to have a political</p> <p>7 viewpoint; isn't he?</p> <p>8 A. I'm not disputing that.</p> <p>9 Q. Okay. Well, then, I -- you're not linking it</p> <p>10 for me, either. If -- if he happened to be a --</p> <p>11 A. I'm sorry. I didn't understand the word that</p> <p>12 you said. I'm not --</p> <p>13 Q. Linking it. I'm originally from Texas, so</p> <p>14 sometimes I drop the G.</p> <p>15 I don't understand how you're linking this. If</p> <p>16 an election worker -- there are thousands of election</p> <p>17 workers in the United States. You know that; right?</p> <p>18 MR. QUEENAN: Object to form and foundation.</p> <p>19 Q. (By Mr. Cain) You know that, don't you?</p> <p>20 A. Yes, I know that.</p> <p>21 Q. Okay. Good.</p> <p>22 And there's a variety, must be a variety of</p> <p>23 political viewpoints amongst election workers; right?</p> <p>24 A. Yes.</p> <p>25 Q. Stands to reason, doesn't it?</p> <p style="text-align: right;">Page 51</p>	<p>1 center of public media attention and policy attention in</p> <p>2 the aftermath of Election 20 -- 2020, and information</p> <p>3 pertaining to high-level officials, particularly one whose</p> <p>4 title is vice president of strategy and security, is</p> <p>5 certainly of great news value to my viewers and should</p> <p>6 have been to any consumers of -- of news at that time.</p> <p>7 MR. QUEENAN: Mr. Cain, just for the record,</p> <p>8 communications from Brad -- it looks like from Brad</p> <p>9 Kloewer -- are coming in, and I can see them on the screen</p> <p>10 share. So I'm assuming they're being recorded. I'm</p> <p>11 guessing that's inadvertent. I just wanted to flag it for</p> <p>12 you.</p> <p>13 MR. CAIN: It's on a separate screen. That's --</p> <p>14 can you see them now?</p> <p>15 MR. QUEENAN: Not now. But there was a pop-up</p> <p>16 on the top right corner where, like -- I'm guessing you're</p> <p>17 on a --</p> <p>18 MR. CAIN: I see.</p> <p>19 MR. QUEENAN: Like, under the date, basically,</p> <p>20 in the top right corner of your screen, I could see Brad</p> <p>21 was -- it looked like it was a proposed question or</p> <p>22 something like that.</p> <p>23 MR. CAIN: Thank you for pointing that out.</p> <p>24 For the record, I generally ignore what Brad has</p> <p>25 to say, so it didn't matter. I'm just kidding, Brad. I</p> <p style="text-align: right;">Page 53</p>

1 actually do care what you have to say.  
2 Q. (By Mr. Cain) Let me ask you: Did you do any  
3 reporting during the 2020 election cycle on Trump poll  
4 workers or Trump election workers in states that Trump  
5 won, or were you just focused on the left?  
6 A. I --  
7 MR. QUEENAN: Object --  
8 A. -- am known as a conservative journalist. That  
9 doesn't mean that I don't cover corruption or shenanigans  
10 on the other side. But in this -- in that election year,  
11 my focus was on election fraud and election shenanigans  
12 and problems that were placed on the left side of the  
13 aisle.  
14 There's -- there's not -- I don't -- not -- I --  
15 I've -- I've never, in the nearly 30 years that I've been  
16 a journalist, ever hid what ideological side of the  
17 spectrum I belong on.  
18 Q. (By Mr. Cain) Yeah. But I asked you a yes/no  
19 question: Did you do any of those stories?  
20 And from what I heard your -- your answer, I'm  
21 going to imply that the answer is no; you didn't do any  
22 stories on Trump election personnel in -- in states that  
23 Trump won. True?  
24 A. True.  
25 Q. Okay. At or around the 11-minute mark -- and

Page 54

1 I'm going to play a little bit more of this, and then  
2 we'll move on to another scintillating topic. This is  
3 when you start going into, I think, the Facebook.  
4 (The video segment was played.)  
5 Q. (By Mr. Cain) And that's because -- I'll stop  
6 there -- because it became evident to you at this point  
7 that this was not a public Facebook page; correct?  
8 MR. QUEENAN: Object to form and foundation.  
9 A. At -- at that point, I wasn't -- I didn't -- I  
10 didn't know what he -- I didn't know what he meant.  
11 But when he told me that he -- he -- he mentions  
12 that he obtained them legally, I -- I took him at his word  
13 because I had no reason to question him or doubt him  
14 otherwise.  
15 Q. (By Mr. Cain) Well, you don't -- I mean, you're  
16 not an attorney; right?  
17 A. No. But you had asked me how I knew him, how  
18 I -- how I came to know his -- his work, what I knew about  
19 his reputation. And based on all of that, I -- I -- I  
20 didn't have reason to -- to think that he was lying to me.  
21 Q. Right. But as of 12 minutes into your live  
22 stream, it's clear to you that you're, on -- on your live  
23 stream -- by the way, let me back up.  
24 Do you know how many people watch your live  
25 stream at any given time?

Page 55

1 MR. QUEENAN: Object to form.  
2 A. Facebook keeps those statistics. And it  
3 sometimes flashes, if I'm paying attention, how many  
4 people will be on it.  
5 Q. (By Mr. Cain) Okay. Any -- any guess on how  
6 many folks were watching your live stream on this day?  
7 A. I don't know. I could go back and look at the  
8 statistics and tell you precisely how many people watched.  
9 Q. All right. Well, suffice it to say that at this  
10 point, 12 minutes in, you know now that you're showing  
11 your live stream audience what purport to be private  
12 Facebook posts by Dr. Coomer; fair?  
13 MR. QUEENAN: Object to form and foundation.  
14 A. So I don't -- I don't know what type of a  
15 Facebook account it was other than that Joe Oltmann  
16 attributed the Facebook posts to Eric Coomer.  
17 Q. (By Mr. Cain) Okay. And that was the extent of  
18 your knowledge?  
19 A. Yes.  
20 Q. And he never disclosed to you the means -- the  
21 manner or means by which he gained access?  
22 A. He said during the live stream that he obtained  
23 them legally.  
24 Q. Do you -- have you done any research since this  
25 live stream as to whether it is legal to access a private

Page 56

1 Facebook page and then post those in a public forum?  
2 A. No.  
3 MR. QUEENAN: Object to form and foundation.  
4 And to the extent that question is calling for  
5 information that would have been gleaned from  
6 attorney-client communications, I -- I'd object to  
7 privilege as well.  
8 MR. CAIN: She's -- I -- I understand that.  
9 She's answered it.  
10 Q. (By Mr. Cain) I'm going to fast forward a  
11 little bit. You -- you keep showing or -- well, let me  
12 ask you this. Were you putting these screenshots up or  
13 was Mr. Oltmann?  
14 A. I was. As I mentioned, he sent me zip files,  
15 and then I opened them as the live stream started. And  
16 then he referred to numbers. And, yes, I was in control  
17 of --  
18 Q. Okay.  
19 A. -- opening them up as he explained them.  
20 Q. And are you seeing these for the first time as  
21 you're opening them up?  
22 A. Yes.  
23 Q. I'm going to go to the 12:58 mark or -- yeah,  
24 somewhere -- well, let's go to 12:49.  
25 (The video segment was played.)

Page 57

<p>1 Q. (By Mr. Cain) Okay. A couple of things there.</p> <p>2 You said "jaw drop, floor" when Mr. Oltmann indicated that</p> <p>3 Dr. Coomer was a major shareholder in Dominion Voting</p> <p>4 Systems.</p> <p>5 Is that -- I assume your jaw dropped because</p> <p>6 that was the first time you'd heard that information.</p> <p>7 A. Yes.</p> <p>8 Q. And that hadn't been part of your -- any</p> <p>9 discussions at the preinterview stage; correct?</p> <p>10 A. No. Correct.</p> <p>11 Q. And then there was some discussion about patents</p> <p>12 and then the market share that Dominion has, and you've</p> <p>13 made the statement, "that's how we go from conspiracy</p> <p>14 theory to conspiracy truth."</p> <p>15 What did you mean by that statement?</p> <p>16 A. Right. So in the context of -- of considering</p> <p>17 whether it would be possible to use these systems to have</p> <p>18 an impact on the election, the market share of Dominion</p> <p>19 lends credibility to the idea that widespread undermining</p> <p>20 of election integrity would be possible.</p> <p>21 Q. And -- and similarly, Mr.-- excuse me,</p> <p>22 Dr. Coomer -- if he's listening, I apologize for</p> <p>23 continuing to say Mr. Coomer.</p> <p>24 Dr. Coomer's status as a major shareholder in a</p> <p>25 company that has the major share of the election services</p> <p>Page 58</p>	<p>1 Go ahead and answer.</p> <p>2 THE WITNESS: Sorry. Sorry. I'll wait a little</p> <p>3 bit more.</p> <p>4 A. That was Joe Oltmann's opinion, and I -- I</p> <p>5 agreed with the sentiment of it, yes.</p> <p>6 Q. (By Mr. Cain) Well, that's not an opinion.</p> <p>7 Being a major shareholder is not an opinion, is it?</p> <p>8 A. No. The idea that being a major shareholder</p> <p>9 could lend itself to the dangers of sabotaging election</p> <p>10 integrity. That's an opinion. And I agree with that</p> <p>11 underlying sentiment --</p> <p>12 Q. Yeah.</p> <p>13 A. -- that it was --</p> <p>14 Q. And conversely, if Dr. Coomer is not a major</p> <p>15 shareholder, then the opposite would be true; right? That</p> <p>16 he wouldn't have the -- the amount of influence over the</p> <p>17 corporate entity that a major shareholder would; fair?</p> <p>18 MR. QUEENAN: Object to form and foundation.</p> <p>19 A. Well, it was certainly a piece of the puzzle,</p> <p>20 you know, given -- given his high profile in the company,</p> <p>21 plus that, plus the animas that he manifested in the -- in</p> <p>22 the Facebook posts. It was all of it.</p> <p>23 Q. (By Mr. Cain) You doing okay, ma'am? Do you</p> <p>24 need a break?</p> <p>25 A. I'm fine.</p> <p>Page 60</p>
<p>1 business, that's an important component to that statement</p> <p>2 too; right?</p> <p>3 MR. QUEENAN: Object to form.</p> <p>4 Q. (By Mr. Cain) Do -- do you want me to restate</p> <p>5 that? That was kind of long and --</p> <p>6 A. Yes.</p> <p>7 Q. Would you like me to restate that? Okay.</p> <p>8 A. Yes, please.</p> <p>9 Q. Part of your statement about conspiracy truth --</p> <p>10 the -- the information that you got about Dr. Coomer being</p> <p>11 a major shareholder in Dominion, that also formed the</p> <p>12 basis for you saying, "We're now into conspiracy truths";</p> <p>13 right?</p> <p>14 A. Yes. That it reaches more towards that than</p> <p>15 dismissing it altogether as something that's -- that's</p> <p>16 unfathomable. And, again, it was in the context of</p> <p>17 discussing these Facebook posts, which are -- are</p> <p>18 troubling considering his position at Dominion.</p> <p>19 Q. Yeah. And if he's a major shareholder in the</p> <p>20 company, then, at least in your mind, that would indicate</p> <p>21 that he had more influence over that -- over Dominion</p> <p>22 Voting Systems; right?</p> <p>23 MR. HICKS: Object to form.</p> <p>24 A. Well, that was Joe -- that was Joe --</p> <p>25 MR. QUEENAN: I just objected to form.</p> <p>Page 59</p>	<p>1 MR. QUEENAN: Do you -- Charlie, I -- I know you</p> <p>2 probably don't have a specific time frame in mind, but are</p> <p>3 you thinking you want to power through until lunch and</p> <p>4 then pick up after that? Does that make sense?</p> <p>5 MR. CAIN: Whatever Sara wants to do and</p> <p>6 Ms. Malkin.</p> <p>7 MR. QUEENAN: Okay. Sounds good.</p> <p>8 Q. (By Mr. Cain) I just want to get a few things</p> <p>9 confirmed for the record.</p> <p>10 Ma'am, I'm going to show you exhibit -- I</p> <p>11 believe it's 19.</p> <p>12 (Exhibit Number 19 was introduced.)</p> <p>13 Q. (By Mr. Cain) Just confirm for me, this is</p> <p>14 November 13th at 12:43. So this would have been after</p> <p>15 this live stream; correct?</p> <p>16 A. Correct.</p> <p>17 Q. And this is going out via Twitter?</p> <p>18 A. Correct.</p> <p>19 Q. All right. So Mr. Oltmann was banned from</p> <p>20 Twitter, as you point out. And this is you -- did -- did</p> <p>21 you post this yourself?</p> <p>22 A. Yes.</p> <p>23 Q. Or do you have a --</p> <p>24 A. Yes. I don't have anyone else. It's just me.</p> <p>25 Q. Okay. By the way, you didn't have -- as far as</p> <p>Page 61</p>

1 your live stream, you produced that. You -- you're the --  
2 you do it soup to nuts; right?  
3 A. I fly solo, yes.  
4 MR. QUEENAN: Object to form.  
5 Q. (By Mr. Cain) All right. So you post this  
6 shortly after the live stream; correct?  
7 A. Correct.  
8 Q. And you talk about the -- the major shareholder.  
9 We looked at that in the -- in the live stream itself;  
10 correct?  
11 A. Correct.  
12 Q. Right. And so you're trying to promote the  
13 story and get -- well, let me ask you this way. You are  
14 trying to promote this story, number one; right?  
15 A. Yes. Of course.  
16 Q. Of course. And can people click on this to --  
17 to view a replay of the live stream?  
18 A. So this is clipped using Twitter Media Studio -  
19 LiveCut, which you can see down there.  
20 Q. Yes, ma'am.  
21 A. It gives people a -- a snippet. So this is a  
22 25-second snippet. And then it doesn't -- there's no  
23 embedded link to the full stream yet because that was a  
24 separate Twitter URL.  
25 So either I will repost the full URL, or when

Page 62

1 the YouTube version is processed, retweet that -- the  
2 YouTube URL.  
3 Q. I gotcha. So this is like an appetizer. It's a  
4 little clip of what your live stream was about.  
5 A. It's pretty standard, yes. Yeah.  
6 Q. Exhibit 20, this is also something that you  
7 posted on Twitter, looks like, at or around the same time;  
8 right?  
9 (Exhibit Number 20 was introduced.)  
10 A. Correct. And that's threaded. So it --  
11 under -- this is underneath the initial tweet of the  
12 snippet, probably, so that if people want to see the whole  
13 thing, they can just click on that URL.  
14 Q. (By Mr. Cain) Great.  
15 (Exhibit Number 21 was introduced.)  
16 Q. (By Mr. Cain) This is Exhibit 21. This is,  
17 again -- appears to be your Twitter account, November 13.  
18 This is a little later than the ones that we saw  
19 previously, and there's someone replying to you: What are  
20 the -- "What are they trying to hide?  
21 #Dominion Voting Systems."  
22 There's this fella named . Do you know  
23 who he is?  
24 A. Yes. He's a young activist and journalist in  
25 Denver who was covering some of these same issues. I

Page 63

1 don't know what that is specifically. But you say I was  
2 replying to someone. Again, it's a thread related to  
3 Dominion.  
4 Q. Well, I didn't say you were. It -- it  
5 appears --  
6 A. No, you did. You said that I was replying to  
7 someone. And I'm just pointing out that I was replying to  
8 myself, because it's a thread.  
9 Q. I see. I see.  
10 A. Yeah.  
11 Q. Now, did -- did you know personally at  
12 this point?  
13 A. No. I interviewed him, though.  
14 Q. Before this?  
15 MR. QUEENAN: Object to form.  
16 Q. (By Mr. Cain) Before this time period?  
17 A. Yeah. I interviewed him before this on a  
18 separate topic.  
19 Q. Okay. All right. So now we're talking about,  
20 you know, shortly after that live stream. As -- as I  
21 understand it, the next time that you posted a story  
22 about -- had anything to do with Dr. Coomer was  
23 November 28th. Does that jibe with your recollection?  
24 A. I believe that's correct. But I could always go  
25 back and search to see if I'd --

Page 64

1 Q. Okay.  
2 A. -- done anything else, but that's my  
3 recollection.  
4 Q. Because I -- and correct me if I'm wrong, I only  
5 know of these two, at least in this medium: A live stream  
6 on the 13th, and then the Newsmax piece on the 28th.  
7 A. Correct.  
8 Q. Okay. And then after the 28th, you did not do  
9 any more stories that directly related to Dr. Coomer;  
10 right?  
11 A. Correct.  
12 Q. Is there a reason why you stopped reporting on  
13 this?  
14 A. I --  
15 Q. Just moved on?  
16 A. I -- I do tons of stories on tons of topics.  
17 Q. But you just moved on?  
18 A. Well, I think that the two stories covered  
19 everything that needed to be said about what Joe Oltmann  
20 had discovered about Eric Coomer and his role at Dominion.  
21 Q. Well --  
22 A. The live stream was 15 minutes and a full  
23 segment on Newsmax.  
24 Q. Okay. Now, let's -- let's talk about the  
25 intervening two weeks, approximately two weeks between the

Page 65

<p>1 live stream and the Newsmax piece. Are you with me on 2 that? 3 A. Yes. 4 Q. Okay. So did you have any discussions, 5 follow-up discussions, with Mr. Oltmann between those two 6 pieces? 7 A. With regard to his specific interview? I 8 don't -- 9 Q. Anything about his allegations that Dr. Coomer 10 was on an Antifa conference call, et cetera. 11 MR. QUEENAN: Object to form. 12 A. Any communications I had, I have produced. 13 Q. (By Mr. Cain) Well, you can't produce a phone 14 call, so that's why I'm asking. 15 A. Yeah. I -- 16 Q. Did you have any -- 17 A. I don't believe -- I don't believe I had any 18 follow-up phone calls with him, no. 19 Q. Okay. Let's do this. Let's go back to those 20 texts we were looking at at the beginning. I believe 21 counsel correctly corrected me when I said they were 15. 22 Let me share this. 23 Okay. So remember this, Ms. Malkin? We looked 24 at this at the beginning. 25 A. Right.</p> <p style="text-align: right;">Page 66</p>	<p>1 Coomer and Dominion? We pretape it tomorrow at 12:30 2 p.m., Mountain Time. It would be one segment that will 3 run around seven minutes." 4 "For you, absolutely. I'm in South Dakota." 5 This is him responding. 6 "So on my computer okay?" 7 You say, "Thank you. Yes, it'll be by Skype. 8 Send me your account name. My Newsmax producer will be in 9 touch soon to nail down logistics." 10 And you ask him about new graphics or documents. 11 You tell him to keep up the fight. 12 He has lots of info, including the Mongolian 13 connection. Do you know what he was referring to with the 14 Mongolian connection? 15 A. No. I don't know what that was. 16 Q. I don't, either. 17 "Let me know if there are specific questions." 18 That's you asking him that. 19 "You've got a seven-minute segment. Three topic 20 areas." 21 And then you ask: "Are you allowed to talk 22 about your conversations with the Trump lawyers?" 23 Were you, presumably, aware that he was talking 24 with the Trump lawyers during the interim period? 25 A. In between the live stream and this? No. I was</p> <p style="text-align: right;">Page 68</p>
<p>1 Q. This is Exhibit 25. 2 A. Right. 3 Q. Right. I'm going to -- I'm going to scroll down 4 as quickly as I can since we're on the clock. Don't look 5 at it if you have problems with blinking lights. 6 A. I (unintelligible) seizure. 7 Q. It may give me one. 8 A. Yeah. 9 Q. This is -- okay. We're -- we're past that where 10 you gave Mr. Oltmann the -- the information on how to do 11 the live stream. 12 I'm going to go down to page -- what I think is 13 where you pick up some more discussions with Mr. Oltmann. 14 There's some intervening messages with 15 Mr. Oltmann. We're going to skip those for today. 16 Something about frauds. 17 Ah. Page 41 of 61. I tried to see if there's a 18 way to jump on this thing, and I haven't figured it out 19 yet. 20 But we're on page 41 of 61 of Exhibit 25, and 21 this is back to your Signal account, right, with 22 Mr. Oltmann now in your contacts; true? 23 A. Yes. 24 Q. All right. So Tuesday, November 24th, at 25 6:08 a.m.: "Can you come on my Newsmax show to talk about</p> <p style="text-align: right;">Page 67</p>	<p>1 referring to what I knew about Lauren McLaughlin asking me 2 for his contact information. 3 Q. Okay. Because you -- had you -- you hadn't been 4 briefed by anyone to update you on the status of either 5 the -- Ms. McLaughlin's request or the affidavit that was 6 referenced -- 7 A. That's correct. 8 Q. -- fair? 9 A. That is correct. 10 Q. And I guess it goes on to say: "That was 11 amazing. Wish we had more time, but I know this segment 12 will have a huge impact. Have a blessed Thanksgiving." 13 So you prerecorded -- correct me if I'm wrong. 14 You prerecorded this segment a couple of days before it 15 aired on Newsmax; true? 16 A. Yes. 17 Q. Okay. And at least by the 28th -- or excuse me, 18 the 25th, you -- you had done that recording; fair? 19 A. Yes. Yes. 20 Q. All right. Okay. So back to my question. 21 During the time between the 13th and this 22 recording on the 25th, the prerecording, had you had any 23 discussions with Mr. Oltmann about any developments 24 concerning Dr. Coomer? 25 A. I don't believe I did. I don't -- I don't</p> <p style="text-align: right;">Page 69</p>



1 recall that I did.  
2 Q. Okay. But you knew from your prior live stream  
3 that -- that Mr. Oltmann said he had taken copious notes  
4 of this Antifa conference call; right?  
5 A. Correct.  
6 Q. And you didn't ask him for those notes, did you?  
7 A. I did not.  
8 Q. And had you learned by this point in time  
9 whether or not there was a recording of the Antifa  
10 conference call?  
11 A. I had not.  
12 Q. And you didn't ask him whether there was a  
13 recording, did you?  
14 A. I did not.  
15 Q. Had you gone on to the Dominion website to look  
16 to see what their position was with respect to election  
17 integrity issues by this point?  
18 MR. QUEENAN: Object to form.  
19 A. I can't recall that I went on their website  
20 specifically. But there had been a spate of news coverage  
21 of Dominion, and -- and where they stood in the --  
22 defending their company.  
23 Q. (By Mr. Cain) Okay. Well, here's what I'm  
24 asking you, ma'am. What did you do, if anything, to  
25 follow up on the November 13th story in preparation for

Page 70

1 the pretaping of the next Oltmann interview?  
2 A. I reviewed the live stream that I had done, and  
3 I reviewed the zip files, which were going to be one of  
4 the subjects of the interview. And I had kept up on the  
5 news of questions that people were raising about Dominion  
6 in the period between my live stream and the taping of the  
7 news program for Newsmax.  
8 Q. Okay. Do -- do you recall approaching Dominion  
9 either for comment -- well, for comment during this  
10 interim period?  
11 A. I don't recall that, no.  
12 Q. Okay. And did you reach out to Dr. Coomer to  
13 get, potentially, his side of the story?  
14 A. I did not.  
15 Q. And did you ask Mr. Oltmann if he knew of -- of  
16 the identities of anybody else that was on this alleged  
17 call?  
18 A. I did not.  
19 Q. So you didn't then independently try to  
20 determine who was -- who -- who may have been on the call  
21 other than Mr. Oltmann and potentially Eric Coomer?  
22 A. I did not.  
23 Q. I'm going to share my screen.  
24 (Exhibit Number 18 was introduced.)  
25 Q. (By Mr. Cain) This is Exhibit 18, which I'll

Page 71

1 represent to you is a screenshot of the Dominion website  
2 from November 28th showing that it was updated  
3 November 25th.  
4 November 25th would have been the day that you  
5 did the -- the prerecording; correct?  
6 A. The morning of the 25th, correct.  
7 Q. Okay. You see it's got a little contact button  
8 here to contact Dominion directly. But you didn't hit --  
9 you didn't hit that button, did you --  
10 A. No.  
11 Q. -- prior to the -- okay. Thank you.  
12 And did you reach out to any of their media? I  
13 know I asked Dominion in general, but any of their public  
14 relations people or media people prior to interviewing  
15 Oltmann the second time?  
16 A. I did not.  
17 Q. And the FAQs that they had posted in response to  
18 what they considered to be disinformation concerning the  
19 election, you didn't review those before interviewing  
20 Mr. Oltmann, did you?  
21 A. Not this specific page, no.  
22 Q. Okay. Well, any page on the Dominion site.  
23 A. Like I said, I was familiar that -- with news  
24 stories in which Dominion was defending itself.  
25 Q. Okay. I think I understand your answer.

Page 72

1 But as of the 25th, as Dominion is reporting on  
2 their website, CISA -- you know who CISA is; right?  
3 A. I do. I had tweeted about CISA's statement.  
4 Q. This statement here that "There is no evidence  
5 that any voting system deleted or lost votes, changed  
6 votes, or was in any way compromised." You tweeted about  
7 that statement?  
8 A. Yes. And I believe the nature of my response  
9 was that CISA itself was a conflict -- conflicted entity  
10 in itself, because many of these same private companies  
11 that it's supposed to watchdog were members of committees  
12 of CISA itself.  
13 Q. Okay. So you don't believe CISA is an  
14 authoritative group as it relates to this issue due to  
15 conflicts of interest; is that fair?  
16 A. Yes.  
17 MR. QUEENAN: Object to form.  
18 Q. (By Mr. Cain) Okay. Now, at this point, did  
19 you have a working theory as to how Dr. Coomer, if, in  
20 fact, he said that he had rigged the election -- the  
21 election, excuse me -- how he had gone about doing so?  
22 A. I did not have such a theory. And as I stated  
23 on the Newsmax program, I did not have any evidence that  
24 he made good on his threat. And I made my conclusion  
25 about that explicit.

Page 73

1 Q. Actually, that's an interesting point. You did  
2 make that disclaimer during the second interview. Was  
3 that something that you wrote?  
4 MR. QUEENAN: Object to the form.  
5 You can answer.  
6 A. Yeah. I didn't write it. I said it.  
7 Q. (By Mr. Cain) Well, you read from a  
8 teleprompter, don't you?  
9 A. My opening monologue is on a teleprompter, and  
10 the rest of the show is a free-flow conversation and  
11 interview with my guests.  
12 Q. Okay. Well, we know that there was a producer  
13 involved in that segment; right? On Newsmax?  
14 A. I have a producer, yes.  
15 Q. All right. And so, I guess, here's -- let's  
16 just go to it since we're on the topic, and you made a  
17 point of saying it.  
18 You had some discussions prior to -- let me get  
19 it real quick -- prior to doing the Newsmax segment with  
20 the gentleman on this next exhibit. So let's -- let's  
21 look at that.  
22 (Exhibit Number 26 was introduced.)  
23 Q. (By Mr. Cain) This is Plaintiff's Exhibit 26.  
24 Now, these are some emails you produced; right, ma'am?  
25 A. I did, yes.

Page 74

1 Q. Okay. About the Wednesday pretape. You've got  
2 guest information, and this is being sent to this fella,  
3 Pierce Sargeant; right?  
4 A. Correct.  
5 Q. Who is -- who's Pierce Sargeant? Is he the  
6 producer?  
7 A. He's a young man who works for Newsmax, and he  
8 handled the nuts and bolts of putting the show together as  
9 my producer, yes.  
10 Q. Okay. And Pierce -- this is what I was talking  
11 about, the -- the teleprompter. This is -- this is what  
12 you're reading off during the beginning of the show;  
13 right?  
14 A. Correct. That's the only time I use one, and  
15 then for teases and the wrap-up of a show.  
16 Q. Okay. Thanks.  
17 Pardon me, again, as I scroll through it.  
18 You say to Pierce on the 25th about the script,  
19 "Let me know you received it."  
20 He got it. Had a question. We won't go into  
21 the question, because it relates to that Philippine  
22 attorney that you put on. And then there's this fella,  
23 Gary Kanofsky. You see that?  
24 A. Yes.  
25 Q. Okay. Who is he?

Page 75

1 A. He's some high-level official at Newsmax. I  
2 can't remember which office he's in -- I believe New York  
3 office -- who was brought in at some point to have some  
4 level of editorial oversight over the show.  
5 Q. Was this the first time that Mr. --  
6 Mr. Kanofsky had been brought in to have editorial  
7 oversight over your show?  
8 A. I believe it was there. There are a couple of  
9 people who, sort of, rotated through. This might have  
10 been the first time I talked to him.  
11 Q. Okay. And so when I was asking you earlier --  
12 and this, kind of, speaks for itself. We're being extra  
13 diligent about how we cover these stories, in sum.  
14 When I was asking you earlier about this  
15 disclaimer that you put on the Newsmax piece about no  
16 evidence of Dr. Coomer actually doing anything with the  
17 election, was that something that Mr. Kanofsky added to  
18 the show as the editor?  
19 A. No.  
20 Q. Or how did that come about?  
21 A. No. That came about in the course of the  
22 discussion with Joe Oltmann in which I wanted to make  
23 clear what my position was. Gary Kanofsky had nothing to  
24 do with it.  
25 Q. Did -- did that clip of Mr. Oltmann on the

Page 76

1 Newsmax piece get edited down from a longer form?  
2 MR. QUEENAN: Object to form.  
3 A. Not as far as I know.  
4 Q. (By Mr. Cain) Okay. So that was the entire  
5 interview unedited?  
6 A. As far as I know. Once I tape the interview, I  
7 do not have control over the footage. So you'd have to  
8 ask them.  
9 Q. I see.  
10 THE VIDEOGRAPHER: Counsel, ten minutes until  
11 required media change.  
12 MR. CAIN: Yeah. And I'm -- I've been pushing  
13 my luck with all the people that are producing this. So  
14 let me just finish this line of questioning.  
15 Q. (By Mr. Cain) The reason I asked that prior  
16 question, ma'am, is there was no scrolling through the  
17 private Facebook pages on the Newsmax piece, unless it was  
18 edited out. Do you recall one way or the other?  
19 MR. QUEENAN: Object to form. And foundation.  
20 A. Could you reask the question? I just want to  
21 make sure I -- that I'm responsive to the question.  
22 Q. (By Mr. Cain) Yeah. Let me break it down.  
23 It's true, just based on your recollection, that  
24 in the second piece, you didn't put up the private  
25 Facebook pages like you did in the live stream; correct?

Page 77

<p>1 MR. QUEENAN: Object to form.</p> <p>2 A. I believe that -- I just -- I don't know if you</p> <p>3 heard me.</p> <p>4 Q. (By Mr. Cain) You talked over each other. Can</p> <p>5 you answer my question again, please?</p> <p>6 THE VIDEOGRAPHER: It looks like the witness is</p> <p>7 froze up.</p> <p>8 MR. CAIN: All right. Let's go off the record</p> <p>9 since we're at the end of the media tape, and we're also</p> <p>10 frozen.</p> <p>11 MR. QUEENAN: Michelle, are you back?</p> <p>12 THE WITNESS: Yeah. Did I -- you guys froze on</p> <p>13 me, so I don't know where I -- it stopped.</p> <p>14 MR. QUEENAN: You froze on us.</p> <p>15 THE WITNESS: Oh, okay. Sorry about that.</p> <p>16 MR. CAIN: We're going to -- we're going to go</p> <p>17 off the record so that we can plug in the internet again.</p> <p>18 THE VIDEOGRAPHER: Counsel, can you stop the</p> <p>19 screen share so I can go off?</p> <p>20 This is the end of Media Number 1. Going off</p> <p>21 the record, this time is 11:58.</p> <p>22 (Recess from 11:58 a.m. to 12:19 p.m.)</p> <p>23 (Mr. Rhodes and Ms. Powell are now present.)</p> <p>24 THE VIDEOGRAPHER: We're back on the record.</p> <p>25 This is the beginning of Media Number 2 in the deposition</p> <p style="text-align: right;">Page 78</p>	<p>1 (Exhibit Number 22 was introduced.)</p> <p>2 Q. (By Mr. Cain) Exhibit 22 -- this is November 15</p> <p>3 at 12:09 p.m., and this is a tweet you sent out; right?</p> <p>4 A. Yeah. This is just a recap of the program that</p> <p>5 I had done, because I can't -- I believe that was a</p> <p>6 Friday. So a lot of people miss the news cycle on Friday,</p> <p>7 so I retweeted it out around the -- the next couple days.</p> <p>8 Q. All right. And looks like you also, on</p> <p>9 November 16th, this would be the next day -- this is</p> <p>10 Plaintiff's Exhibit 23 -- you tweeted out this as well;</p> <p>11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. "#WhoIsEricCoomer," et cetera, "Denver business</p> <p>14 owner," that's a reference to Mr. -- Mr. Oltmann; correct?</p> <p>15 A. Correct.</p> <p>16 Q. "Dominion's Eric Coomer is an unhinged</p> <p>17 sociopath - his internet profile is being deleted and</p> <p>18 erased."</p> <p>19 And there's a -- you tweeted out a picture that</p> <p>20 came with this Gateway Pundit article; correct?</p> <p>21 MR. QUEENAN: Object to form and foundation.</p> <p>22 A. There is a -- a retweet of the -- this is the</p> <p>23 news story in that it's embedded in the Gateway Pundit</p> <p>24 website.</p> <p>25 Q. (By Mr. Cain) Right.</p> <p style="text-align: right;">Page 80</p>
<p>1 of Michelle Malkin. The time is 12:19 p.m.</p> <p>2 Q. (By Mr. Cain) Ms. Malkin, do you recall whether</p> <p>3 or not you displayed the private Facebook messages in the</p> <p>4 Newsmax piece?</p> <p>5 A. I did not.</p> <p>6 MR. QUEENAN: Form.</p> <p>7 Q. (By Mr. Cain) Is there a reason why you didn't?</p> <p>8 A. We didn't get to them.</p> <p>9 Q. But that was your plan?</p> <p>10 A. I didn't have a plan. The interview flowed for</p> <p>11 seven minutes, and I'm constrained in a way that I'm not</p> <p>12 with the live stream. And we didn't get to hit on that</p> <p>13 before the segment ended.</p> <p>14 Q. Okay. And in the prior session, I asked you</p> <p>15 what you did between -- in the two weeks to investigate</p> <p>16 this story further before going to the -- to the Newsmax</p> <p>17 taping, and you answered me.</p> <p>18 Is there anything else that, as you sit here,</p> <p>19 you can think of you did to investigate this Antifa call</p> <p>20 or Dr. Coomer?</p> <p>21 MR. QUEENAN: Object to form.</p> <p>22 A. Not that I recall.</p> <p>23 Q. (By Mr. Cain) Now, you did have the time during</p> <p>24 that interim period I just referenced to continue</p> <p>25 tweeting.</p> <p style="text-align: right;">Page 79</p>	<p>1 A. So whatever they chose as the featured images</p> <p>2 was embedded in the URL that I tweeted.</p> <p>3 Q. Right. So you would have had to go to the</p> <p>4 Gateway Pundit website first; correct?</p> <p>5 A. Sometimes you just take the URL from the</p> <p>6 account, the Twitter account, of the -- of the blog or</p> <p>7 whoever --</p> <p>8 Q. Right.</p> <p>9 A. -- and it -- and it will automatically populate</p> <p>10 the image and the headline. And that's what happened</p> <p>11 here.</p> <p>12 Q. Okay. But did -- did you actually read this</p> <p>13 article before you retweeted it?</p> <p>14 A. Yes.</p> <p>15 Q. And you -- you obviously knew at this point that</p> <p>16 your story about the -- the Oltmann so-called Antifa</p> <p>17 conference call had been published previously, and now</p> <p>18 you're retweeting something about my client being an</p> <p>19 unhinged sociopath, with a link to -- that included his</p> <p>20 picture.</p> <p>21 Is that fair?</p> <p>22 MR. QUEENAN: Object to form.</p> <p>23 A. Can you -- there was a lot in there. Can you --</p> <p>24 you repeat the question?</p> <p>25 Q. (By Mr. Cain) Yeah, I can. I'll break it down.</p> <p style="text-align: right;">Page 81</p>



<p>1 So by this point on the 16th, you had -- you'd</p> <p>2 already done the live stream; correct?</p> <p>3 A. Correct.</p> <p>4 Q. And then you had -- we saw those earlier tweets</p> <p>5 where you retweeted the live stream; true?</p> <p>6 A. Right. Yes.</p> <p>7 Q. All right. And then we saw just -- just a</p> <p>8 second ago the tweet about Dr. Coomer being a major</p> <p>9 shareholder in Dominion. You did that; right?</p> <p>10 A. Right.</p> <p>11 Q. And now you're tweeting about Dr. Coomer being</p> <p>12 an unhinged sociopath --</p> <p>13 MR. QUEENAN: Object to form and foundation.</p> <p>14 Q. (By Mr. Cain) -- is that right?</p> <p>15 A. This was the headline of the Gateway Pundit post</p> <p>16 which was summarizing Joe Oltmann's characterization of</p> <p>17 Eric Coomer based on the Facebook posts that we discussed</p> <p>18 in our live stream. And the article was summarizing my</p> <p>19 live stream interview with Joe Oltmann.</p> <p>20 Q. Okay. But why are you tweeting out something</p> <p>21 about Dr. Coomer being an unhinged sociopath?</p> <p>22 A. I was --</p> <p>23 Q. Why do this?</p> <p>24 A. I was sharing a post that covered the live</p> <p>25 stream that I had done with Joe Oltmann.</p> <p>Page 82</p>	<p>1 I'm just trying to find out if you'd had any</p> <p>2 interactions with either The Gateway Pundit or Mr. Hoft</p> <p>3 about this story prior to retweeting this picture.</p> <p>4 A. I don't recall that I did, no.</p> <p>5 Q. Do you know Jim Hoft?</p> <p>6 A. I do.</p> <p>7 Q. How do you know him?</p> <p>8 A. From the earliest days of the conservative</p> <p>9 blogosphere.</p> <p>10 Q. Okay. Do you guys -- like we saw those texts,</p> <p>11 do you guys share texts?</p> <p>12 A. I haven't texted with him in -- I haven't texted</p> <p>13 with him in years.</p> <p>14 Q. Okay. And did you talk to anybody at</p> <p>15 The Gateway Pundit or Mr. Hoft directly about this Coomer</p> <p>16 story that we're looking at on Plaintiff's Exhibit 23?</p> <p>17 A. About this story in particular? I don't recall</p> <p>18 that I did.</p> <p>19 Q. Okay. Let me broaden it out, then, since you</p> <p>20 referenced "this story" in particular.</p> <p>21 Did you have any discussions with Mr. Hoft or</p> <p>22 the Gateway Pundit either right before the election or</p> <p>23 after the election up to this point in time about</p> <p>24 Dominion Voting Systems?</p> <p>25 MR. QUEENAN: Object to form.</p> <p>Page 84</p>
<p>1 Q. Okay. Now, did you know at this point whether</p> <p>2 or not Dominion employees were beginning to receive death</p> <p>3 threats, including Dr. Coomer?</p> <p>4 MR. QUEENAN: Object to form and foundation.</p> <p>5 A. I don't recall that I knew that when I tweeted</p> <p>6 this out, no.</p> <p>7 Q. (By Mr. Cain) Did you -- did you ever look into</p> <p>8 the effect of the news stories concerning Dr. Coomer and</p> <p>9 whether or not he was receiving death threats? Did you</p> <p>10 ever look at that?</p> <p>11 MR. QUEENAN: Object to form and foundation.</p> <p>12 A. At some point I became aware of news coverage of</p> <p>13 Eric Coomer complaining about death threats to him. Yes.</p> <p>14 Q. (By Mr. Cain) And before -- at least as of this</p> <p>15 point, you're tweeting out to your roughly two million</p> <p>16 followers a link to an article that has a picture of him,</p> <p>17 aren't you?</p> <p>18 A. Yes.</p> <p>19 Q. Had you talked to The Gateway Pundit, anybody</p> <p>20 associated with them, prior to November 16, 2020, when you</p> <p>21 retweeted this about Dr. Coomer?</p> <p>22 A. Talked to them about this specifically, about</p> <p>23 this --</p> <p>24 Q. Yeah. And I'm sorry. I'll clarify it if I need</p> <p>25 to.</p> <p>Page 83</p>	<p>1 A. I don't recall. I don't recall that I did.</p> <p>2 Q. (By Mr. Cain) Do you have -- I'm sorry.</p> <p>3 When you retweet something like this, this</p> <p>4 Gateway Pundit article, is that something you do just</p> <p>5 because the spirit moves you? Or is there some agreement</p> <p>6 between media outlets to retweet each other's content?</p> <p>7 MR. QUEENAN: Form and foundation.</p> <p>8 A. In general, I do not have any kind of agreement</p> <p>9 with anyone about what I put on my Twitter account.</p> <p>10 Q. (By Mr. Cain) Okay. And so this wasn't -- this</p> <p>11 wasn't the result of some agreement that you had with --</p> <p>12 A. Yes.</p> <p>13 Q. -- Mr. Hoft; fair?</p> <p>14 A. Fair, yes.</p> <p>15 Q. Okay. I meant to ask you earlier when we looked</p> <p>16 at that live stream. Is there a way that you are able to</p> <p>17 monetize a live stream such as the one that we saw with</p> <p>18 Mr. Oltmann?</p> <p>19 A. No. I am -- I do not -- I have no monetization</p> <p>20 on any of my social media.</p> <p>21 Q. But at the time that you did the</p> <p>22 Sovereign Nation piece, that's your -- that was the show</p> <p>23 that you had on Newsmax; right?</p> <p>24 A. Correct.</p> <p>25 Q. Is that -- is that show still running?</p> <p>Page 85</p>

<p>1 A. No.</p> <p>2 Q. All right. At the time that you were doing the</p> <p>3 Sovereign Nation program, did you have a financial</p> <p>4 arrangement with Newsmax for them to be able to run that</p> <p>5 show on their air way -- airwaves?</p> <p>6 A. I did.</p> <p>7 Q. And I don't really care how much money you made</p> <p>8 or didn't make, but is it -- is it based on a per-episode</p> <p>9 formula or just -- how is that generally structured?</p> <p>10 A. I had a contract with Newsmax to produce a show</p> <p>11 and to appear on other shows.</p> <p>12 Q. And is that based, though, on the number of</p> <p>13 appearances and shows you produce? That was my question.</p> <p>14 A. I had an agreement to produce a -- a -- my</p> <p>15 half-hour weekend show, and there was a -- a set number of</p> <p>16 shows that I had agreed to do, as well as appearances for</p> <p>17 other shows. That -- that's the general nature of the</p> <p>18 contract.</p> <p>19 Q. Okay. And -- and given that you're no longer</p> <p>20 with them, is it because the set number of shows that you</p> <p>21 agreed to do, you had reached the conclusion of -- of that</p> <p>22 contract?</p> <p>23 A. I ended my relationship with Newsmax.</p> <p>24 Q. Was that after they ran the retraction?</p> <p>25 MR. QUEENAN: Object to form and foundation.</p> <p>Page 86</p>	<p>1 Q. (By Mr. Cain) This looks like "In case you</p> <p>2 missed it," a November 19th tweet; fair?</p> <p>3 A. Yes.</p> <p>4 Q. Concerning the prior live stream; right?</p> <p>5 A. Correct.</p> <p>6 Q. All right. So we know you -- you had time to do</p> <p>7 the tweeting. Did you -- did you have time, by this</p> <p>8 point, to go back -- remember we looked at the Dominion</p> <p>9 website FAQ? Did you have time to go back and really get</p> <p>10 into the Dominion position on election interference</p> <p>11 issues?</p> <p>12 MR. QUEENAN: Object to form.</p> <p>13 A. As I stated, I was familiar with their defense</p> <p>14 of -- of their -- their conduct during the election.</p> <p>15 Q. (By Mr. Cain) And I think I checked this box,</p> <p>16 but let me just make sure.</p> <p>17 You're not here sitting today telling either</p> <p>18 Judge Moses or the jury that you have some evidence</p> <p>19 that -- that Dr. Coomer actually made good on his threats</p> <p>20 and had some role in rigging the election; fair?</p> <p>21 MR. QUEENAN: Form.</p> <p>22 A. Can you just restate it? Because I just want to</p> <p>23 make sure that I answer it correctly. Just -- it was</p> <p>24 just -- could you say it over again?</p> <p>25 Q. (By Mr. Cain) You have no evidence that</p> <p>Page 88</p>
<p>1 And I don't think that has anything to do with this case</p> <p>2 at all.</p> <p>3 MR. CAIN: Okay. Retraction from Newsmax, I</p> <p>4 think, is probably relevant.</p> <p>5 Q. (By Mr. Cain) But I -- I'm asking just from a</p> <p>6 timing standpoint, did you end your contract with Newsmax,</p> <p>7 as you put it, after they issued the retraction relating</p> <p>8 to Dr. Coomer?</p> <p>9 A. I did end it after that. And there were many</p> <p>10 reasons why I ended my contract with Newsmax, not merely</p> <p>11 or even because of this case.</p> <p>12 Q. Well, was Dr. -- the Dr. Coomer retraction one</p> <p>13 of the reasons that you ended your contract with Newsmax?</p> <p>14 Yes or no?</p> <p>15 A. It had -- it had an influence on my decision,</p> <p>16 which had already been made.</p> <p>17 Q. I see.</p> <p>18 Okay. Well, I got a little far afield. We were</p> <p>19 talking about the unhinged sociopath retweet, and then I</p> <p>20 went to Sovereign Nation. So let's just, kind of, finish</p> <p>21 up on your tweeting.</p> <p>22 MR. CAIN: This is Exhibit 23.</p> <p>23 (Exhibit Number 23 was introduced.)</p> <p>24 MR. CAIN: Exhibit 24.</p> <p>25 (Exhibit Number 24 was introduced.)</p> <p>Page 87</p>	<p>1 Dr. Coomer rigged the election, do you?</p> <p>2 A. That is correct. And that's what I stated on</p> <p>3 Newsmax, and that is what I believe today.</p> <p>4 Q. All right. Thank you. It's always better when</p> <p>5 I ask shorter questions.</p> <p>6 MR. QUEENAN: It's not just you.</p> <p>7 (Exhibit Number 17 was introduced.)</p> <p>8 Q. (By Mr. Cain) Okay. Ms. Malkin, I'm going to</p> <p>9 turn your attention now to Exhibit 17, which is, as you</p> <p>10 can see, November 28th. This is when the second Coomer</p> <p>11 story ran; correct?</p> <p>12 A. Correct.</p> <p>13 Q. All right. I'll just -- you said earlier at the</p> <p>14 beginning, you kind of have prepared remarks that you read</p> <p>15 from the teleprompter; right?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. Let's just -- let's just watch a little</p> <p>18 of the beginning of this.</p> <p>19 (The video segment was played.)</p> <p>20 Q. (By Mr. Cain) I'm sorry. What is the reference</p> <p>21 there? I didn't -- to the "feckless fourth estate"? What</p> <p>22 does that mean?</p> <p>23 A. Most of the corporate media that was not</p> <p>24 reporting on election fraud and election integrity issues.</p> <p>25 "Feckless" --</p> <p>Page 89</p>

<p>1 Q. I know what --</p> <p>2 A. -- dictionary definition.</p> <p>3 Q. Yeah. The "fourth estate" is the media; right?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 All right. Well, you go on in this report --</p> <p>7 I'm not going to play the stuff about Mr. Chong. Let me</p> <p>8 fast forward a little bit.</p> <p>9 You show a hacker that talks about hacking into</p> <p>10 voting machines; right? Remember that part of it?</p> <p>11 A. I do.</p> <p>12 MR. QUEENAN: Object to form.</p> <p>13 Q. (By Mr. Cain) And, you know, just from a --</p> <p>14 from an actual technical standpoint, you know, I asked you</p> <p>15 about Dr. Coomer and whether he had any role in -- in</p> <p>16 engaging in rigging the election.</p> <p>17 The hacker that you put up on this particular</p> <p>18 program had direct access to the voting machine; correct?</p> <p>19 He was able to plug directly into it; true?</p> <p>20 A. I believe that's correct.</p> <p>21 Q. Okay. And are you aware of any evidence of that</p> <p>22 occurring during the 2020 presidential election --</p> <p>23 MR. QUEENAN: Object to --</p> <p>24 Q. (By Mr. Cain) -- where a malicious actor was</p> <p>25 able to hack directly into -- into any of the election</p> <p>Page 90</p>	<p>1 MR. QUEENAN: She's back.</p> <p>2 THE VIDEOGRAPHER: Staying on the record.</p> <p>3 Q. (By Mr. Cain) All right. Okay. So you froze</p> <p>4 in the middle of pointing out that this is from Now This,</p> <p>5 which is a left-wing organization, and you were just</p> <p>6 replaying that. Is that a fair statement?</p> <p>7 A. Yes, that's correct. And we attributed our</p> <p>8 sources on this, and that's why the -- it's labeled.</p> <p>9 Q. Gotcha.</p> <p>10 And then it cuts back to you. We'll just pick</p> <p>11 up there.</p> <p>12 (The video segment was played.)</p> <p>13 Q. (By Mr. Cain) I'm going to stop you right</p> <p>14 there.</p> <p>15 What's the basis for that statement, "Smartmatic</p> <p>16 machines have used Dominion software"?</p> <p>17 THE VIDEOGRAPHER: Looks like she froze up</p> <p>18 again, Counsel. Can we go off the record?</p> <p>19 MR. CAIN: Yes.</p> <p>20 THE VIDEOGRAPHER: Going off the record. The</p> <p>21 time is 12:40.</p> <p>22 (Video-recording was stopped.)</p> <p>23 THE WITNESS: The last thing I heard -- can</p> <p>24 everybody hear me?</p> <p>25 MR. CAIN: Yeah.</p> <p>Page 92</p>
<p>1 machines, either tabulators or voting machines?</p> <p>2 A. I'm just trying to recall what your -- the</p> <p>3 question was, am I aware of it?</p> <p>4 Q. Yeah. I mean, you -- you show a hacker --</p> <p>5 A. No. I just wanted to make sure that that's what</p> <p>6 you said: Am I aware.</p> <p>7 Q. Yeah.</p> <p>8 A. No.</p> <p>9 Q. All right. And I'm going to fast forward</p> <p>10 through the hacker.</p> <p>11 By the way, where did you interview this</p> <p>12 particular hacker? Was that at one of those symposiums?</p> <p>13 A. I did not interview the hacker.</p> <p>14 As you can see, the bug of the media</p> <p>15 organization called Now This, which is a left-wing</p> <p>16 journalism outfit, ran this story a couple of years ago.</p> <p>17 And I was informing my audience that concerns about</p> <p>18 hacking into these electronic voting machines were</p> <p>19 shared on --</p> <p>20 MR. CAIN: Well, here we go again. Michelle is</p> <p>21 frozen, so let's go off the record until she unfreezes.</p> <p>22 THE VIDEOGRAPHER: Going off the record. The</p> <p>23 time is --</p> <p>24 THE WITNESS: Hello. I'm here.</p> <p>25 MR. CAIN: She's back.</p> <p>Page 91</p>	<p>1 THE WITNESS: -- was, what was the basis for the</p> <p>2 statement "Smartmatic machines have used Dominion</p> <p>3 software"?</p> <p>4 THE VIDEOGRAPHER: Michelle, can you go ahead</p> <p>5 and log completely off and come back in? Your -- your</p> <p>6 internet connection is very intermittent.</p> <p>7 THE WITNESS: Okay.</p> <p>8 (Recess from 12:40 p.m. until 12:43 p.m.)</p> <p>9 THE VIDEOGRAPHER: All right. We're back on</p> <p>10 the -- we're back on the record. The time is 12:43.</p> <p>11 Q. (By Mr. Cain) Ms. Malkin, we've had some</p> <p>12 interruptions, technical issues.</p> <p>13 I'm going to go back to an exhibit that we</p> <p>14 started to talk about before this went off the rails.</p> <p>15 Okay. So we started the Sovereign Nation video</p> <p>16 a bit ago. Showed you the intro. Then we started talking</p> <p>17 about the hacker interview that you replayed.</p> <p>18 Then I started to play this next segment after</p> <p>19 you came back from the hacker piece. So I'm going to</p> <p>20 replay that.</p> <p>21 (The video segment was played.)</p> <p>22 Q. (By Mr. Cain) Okay. So then you go on to talk</p> <p>23 about the Philippines and voting issues there.</p> <p>24 And what I was asking you when everything froze</p> <p>25 is, what was the basis of your statement that Smartmatic</p> <p>Page 93</p>

1 machines had used Dominion software, if you can answer  
2 that.

3 MR. QUEENAN: Counsel, there's a commentary  
4 running in the top right corner between you, Brad, and  
5 Steve that's kind of disparaging of Ms. Malkin.

6 So I don't know if there's something we can do  
7 about that, but it's kind of distracting.

8 MR. CAIN: All right. Well, whoever is texting,  
9 don't text me.

10 Q. (By Mr. Cain) Can you answer my question?

11 A. Can you restate the question?

12 Q. Yes. What evidence do you have that Smartmatic  
13 machines have used Dominion software in the past? You  
14 stated that in your segment.

15 A. Yes. I'll have to -- I would have to go back  
16 and look at my notes.

17 I had corroborating links and references in my  
18 script and my research, so I'm confident that what I said  
19 is true.

20 Q. Okay. So you did do some research on voting  
21 software and the relationship between Smartmatic and  
22 Dominion prior to this episode; right?

23 A. Okay. I'm back. Yes.

24 Q. Did you hear my question?

25 A. Can you restate it?

Page 94

1 Q. I said, so you did do some research prior to  
2 this episode regarding the use of Dominion software by  
3 Smartmatic and the -- the relationship between those  
4 companies; correct?

5 A. For the monologue in which I mentioned these  
6 things, yes.

7 Q. All right. And you also did some research, it  
8 sounds like, about shell companies that were in place that  
9 had -- I guess that tied Dominion to Smartmatic from an  
10 ownership standpoint.

11 Is that true, too?

12 A. Yes.

13 Q. Okay. And can you, as you sit here, explain for  
14 the judge and the jury what the relationship is that you  
15 discovered between Smartmatic on the one hand and Dominion  
16 on the other?

17 A. It's as I stated in the monologue. What I  
18 summarized from my research were the descriptions of those  
19 relationships as stated in the monologue based on research  
20 that I had done citing newspaper articles from the  
21 Los Angeles Times, I believe the Huffington Post, the  
22 Washington Post, as well as couple of government agencies,  
23 including, I think, an agency whose acronym was NIST, and  
24 another one who I believe was CFIUS.

25 Q. Okay. And those are embedded in your notes as

Page 95

1 part of your script?

2 A. Correct.

3 Q. Okay. So any research that you would have done  
4 regarding ownership issues, we could just simply go back  
5 to the notes that you produced and look at the references?

6 A. Yes. I believe there was one other email that  
7 included a bunch of the URLs that I had sent to a  
8 different producer.

9 Q. Okay. And you've produced those?

10 A. Not that specific one, because it did not  
11 pertain to Eric Coomer.

12 Q. I see.

13 All right. Now, you talk a fair amount during  
14 this particular clip -- and I don't really have an  
15 interest in looking into it -- but you talk about issues  
16 in the Philippines when you interview this attorney,  
17 Mr. Chong; right?

18 A. Correct.

19 Q. Right. So we'll go through the commercials and  
20 that -- that part of it. Get to, I think, around  
21 ten minutes in, ten-and-a-half minutes in when you come  
22 back from commercial.

23 Here we are.

24 (The video segment was played.)

25 Q. (By Mr. Cain) I forgot to ask you earlier, the

Page 96

1 reference to him being affiliated with the Antifa  
2 movement -- did you look into that particular issue, the  
3 structure of -- if there is a structure of Antifa and how  
4 it's organized in Central Colorado or on the Front Range?

5 MR. QUEENAN: Object to form.

6 A. I had been covering Antifa in Denver,  
7 Colorado Springs, and across the country, yes.

8 Q. (By Mr. Cain) So does that group, if you want  
9 to call it a group, have a formal structure that you're  
10 aware of?

11 A. Some of the cell organizations have very defined  
12 formal structures, yes.

13 Q. Okay. Can you give -- can you give me an  
14 example of one of those, please?

15 A. Sure. The oldest Antifa chapter in the United  
16 States is Rose City Antifa, and they have formal  
17 structure, formal meetings, formal recruitment, and that  
18 has been documented by journalists. And there's chapters  
19 across the country, including chapters in Denver and  
20 Colorado Springs.

21 Q. Okay. So it sounds like you have a pretty  
22 decent amount of familiarity with that being here in  
23 Colorado; right?

24 A. And in other parts of the country, yes.

25 Q. Sure. And throughout your either looking into

Page 97

25 (Pages 94 - 97)



1 Antifa or being familiar with them, did you ever run  
2 across Eric Coomer as being a member of that loosely  
3 affiliated organization?  
4 MR. QUEENAN: Object to form.  
5 A. I did not.  
6 (The video segment was played.)  
7 Q. (By Mr. Cain) Now, you didn't follow up -- and  
8 I'll play it. Let's just play it.  
9 (The video segment was played.)  
10 Q. (By Mr. Cain) I'll stop there.  
11 He just said -- I believe he followed up on his  
12 ability to affect the election. But you did not, in this  
13 piece, think to ask him what the basis of his belief was;  
14 right -- that Dr. Coomer committed election fraud?  
15 A. That was his conclusion based on his research  
16 and based on what he saw of Eric Coomer's Facebook posts  
17 That's his opinion. That was his conclusion.  
18 Mine was the opposite, and both views were aired  
19 in this segment.  
20 Q. Right. You're talking about the later statement  
21 that you make that we'll talk about. But you've mentioned  
22 it already, where you -- where you said you didn't find  
23 any evidence; fair?  
24 A. Yes. And these were -- this was a -- sort of  
25 the opening, and he's barely begun to talk yet, and I let

Page 98

1 him talk.  
2 Q. Yes. Let's let him talk a little more.  
3 (The video segment was played.)  
4 Q. (By Mr. Cain) So, basically, this is  
5 substantially similar to the -- the story that Mr. Oltmann  
6 gave you on November 13th; is that accurate?  
7 A. Yes.  
8 Q. Let me ask you: When you use that term  
9 "alarming," at that point you knew, because you were about  
10 to say it, that there was no evidence that -- that  
11 Dr. Coomer actually did anything to affect the election.  
12 So what was so alarming about it that caused you  
13 to make that statement?  
14 A. What was alarming was the possibility that he  
15 could have fulfilled that threat. And that's why I was  
16 sharing this information, because I wanted people to know  
17 what Joe Oltmann had discovered about him. It is  
18 alarming.  
19 Q. Well, he could have. "He could have" is  
20 conjecture; is it not?  
21 MR. QUEENAN: Object to form and foundation.  
22 A. The intent of this segment was to air  
23 Joe Oltmann's discoveries and raise questions and call for  
24 further investigation of what he had discovered.  
25 Q. (By Mr. Cain) Okay. But my question, again,

Page 99

1 was different. It's whether he could have done something  
2 is conjecture; true? You would, at least, agree with  
3 that?  
4 A. Yes. We're raising the possibility that he --  
5 he might have made good on the threat. And yes, it is  
6 exploring the possibility that he could have done it, yes.  
7 Q. (By Mr. Cain) Okay. Give me a working theory,  
8 if he could have done it, how he could have rigged the  
9 election such that you would say that on this -- on this  
10 broadcast?  
11 MR. QUEENAN: Object to form.  
12 Q. (By Mr. Cain) How could he?  
13 A. I'm not -- I'm not a statistical person. I'm  
14 not a technical person. I don't have the software or IT  
15 background that Joe Oltmann has.  
16 But as a high-ranking member of an electronic  
17 voting system company that has products in nearly 30  
18 states in the United States, somebody whose title is vice  
19 president of strategy and security, one could imagine that  
20 Eric Coomer might have had some ability to access that  
21 system and do something untoward.  
22 I can't spell out all of the specs of how it  
23 might be done, and this is why we were discussing whether  
24 he had the motivation or the means or the bias to do such  
25 a thing. It wasn't my intent to get into the nuts and

Page 100

1 bolts of how exactly that might have happened.  
2 Q. Let me break that down.  
3 You're not -- you're not a technical person as  
4 it relates to how voting systems are implemented on -- on  
5 the various states and counties; right?  
6 A. Right.  
7 Q. Okay. And you don't have any technical  
8 expertise with respect to the -- the voting software  
9 that's used and the process by which it goes from Dominion  
10 through certification to the various jurisdictions. You  
11 don't have any expertise in that; right?  
12 A. Right. I couldn't describe for you the -- the  
13 actual implementation of how such a thing would be done.  
14 But as I had mentioned in the monologue, there had been a  
15 lot of concerns about how such a thing could be  
16 perpetrated.  
17 Q. Right. Well, what -- what I was asking you was,  
18 give me your theory. When you say that he could -- or he  
19 had the ability to carry out this threat -- alleged  
20 threat -- what -- under what circumstance? Under what  
21 practical circumstance?  
22 A. Yeah. So I don't have a theory, and that is why  
23 I was interviewing Joe Oltmann.  
24 Q. Well, he's not an election expert, is he?  
25 A. He -- his business is in IT. My understanding

Page 101

<p>1 is that he is a tech entrepreneur.</p> <p>2 Q. So? What does that have to do with elections?</p> <p>3 MR. QUEENAN: Object to form and foundation.</p> <p>4 A. He works in software and data.</p> <p>5 Q. (By Mr. Cain) So? Did you see any of his data?</p> <p>6 A. You were asking about what kind of expertise I</p> <p>7 have --</p> <p>8 Q. No, ma'am --</p> <p>9 A. -- and, no, I did not see --</p> <p>10 (Simultaneous speakers.)</p> <p>11 Q. (By Mr. Cain) Did you see any of his data?</p> <p>12 A. No, I did not see his data.</p> <p>13 Q. Did you ask for his data?</p> <p>14 A. He gave me two zip files of Facebook</p> <p>15 screenshots.</p> <p>16 Q. That's not what I'm talking about. I'm talking</p> <p>17 about data relating to election riggin' -- rigging, with a</p> <p>18 G, or fraud.</p> <p>19 MR. QUEENAN: Object to form.</p> <p>20 Q. (By Mr. Cain) Anything like that?</p> <p>21 A. No. I did not see his data, as I stated.</p> <p>22 Q. So as you sit here, you cannot cite to the Court</p> <p>23 one working theory as to how Eric Coomer could have rigged</p> <p>24 the 2020 presidential election; isn't that true?</p> <p>25 MR. QUEENAN: Object to form.</p> <p style="text-align: right;">Page 102</p>	<p>1 patented, that's a normal process by which the company</p> <p>2 would own the patent, and the inventor might be the -- the</p> <p>3 scientists that have worked for that company. Are you</p> <p>4 familiar with that paradigm?</p> <p>5 A. Yes.</p> <p>6 MR. QUEENAN: Object to form and foundation.</p> <p>7 Q. (By Mr. Cain) So what is unusual about the fact</p> <p>8 that Dr. Coomer would be associated with -- with Dominion</p> <p>9 patents? Who cares?</p> <p>10 MR. QUEENAN: Object to form.</p> <p>11 A. Some people might care.</p> <p>12 Q. (By Mr. Cain) Well, why did you state it? What</p> <p>13 was the relevance to you when you were stating it?</p> <p>14 A. It underscored his high profile and his</p> <p>15 expertise and his position at the company.</p> <p>16 Q. (By Mr. Cain) Okay.</p> <p>17 (The video segment was played.)</p> <p>18 Q. (By Mr. Cain) Now, I'm just going to go through</p> <p>19 that.</p> <p>20 Any relevance in your mind to the fact that</p> <p>21 Dr. Coomer was a witness in Georgia for the secretary of</p> <p>22 state?</p> <p>23 A. I think he's just establishing that -- that</p> <p>24 Eric Coomer played a pivotal role at -- at the company,</p> <p>25 and that was -- that was one of the notable things that he</p> <p style="text-align: right;">Page 104</p>
<p>1 A. That is true.</p> <p>2 Q. (By Mr. Cain) All right. Now, you go on --</p> <p>3 (The video segment was played.)</p> <p>4 Q. (By Mr. Cain) That's what you were referring to</p> <p>5 earlier -- the research you did; right? The relationship</p> <p>6 between Smartmatic and Dominion and, perhaps, Sequoia;</p> <p>7 right?</p> <p>8 A. Correct.</p> <p>9 (The video segment was played.)</p> <p>10 Q. (By Mr. Cain) Were you provided with the</p> <p>11 patents, or did you do any research about whether he had</p> <p>12 patents and who owned them?</p> <p>13 A. I believe I might have done a Google search at</p> <p>14 some point, and his name came up. But Joe Oltmann did not</p> <p>15 provide that information for me, nor did I solicit it from</p> <p>16 him.</p> <p>17 Q. Nor did you review any of the patents</p> <p>18 themselves?</p> <p>19 A. I just said I believe I -- I might have Googled</p> <p>20 and saw his name on patents that were attributed to him.</p> <p>21 Q. Well, I mean, even just a -- you're a</p> <p>22 businesswoman and a journalist, are you not?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And you know that when technical people</p> <p>25 work for companies and there's technology that's -- that's</p> <p style="text-align: right;">Page 103</p>	<p>1 did.</p> <p>2 (The video segment was played.)</p> <p>3 Q. (By Mr. Cain) Changing votes -- do you know</p> <p>4 what the adjudication process is?</p> <p>5 MR. QUEENAN: Objection.</p> <p>6 Q. (By Mr. Cain) -- in elections?</p> <p>7 A. In general, yes.</p> <p>8 Q. Okay. And in terms of this reference to</p> <p>9 changing votes, you're aware, and were aware at this time,</p> <p>10 that when ballots are flagged because there's an anomaly</p> <p>11 on it, then you go through -- that ballot will go through</p> <p>12 this adjudication process; right?</p> <p>13 A. That is my --</p> <p>14 MR. QUEENAN: Object to form and foundation.</p> <p>15 A. That is my understanding.</p> <p>16 Q. (By Mr. Cain) Okay. I'm sorry if I talked over</p> <p>17 you.</p> <p>18 And that adjudication process involves one</p> <p>19 member from the Democratic party and one member from the</p> <p>20 Republican party examining the actual ballot; right?</p> <p>21 A. Right.</p> <p>22 Q. Coming to a determination as to what the voter</p> <p>23 intent was based on the review of the ballot; correct?</p> <p>24 A. Okay. Yes.</p> <p>25 Q. So when -- when Mr. Oltmann's talking about</p> <p style="text-align: right;">Page 105</p>

1 changing votes, is there some other paradigm that -- that  
2 you can think of besides the adjudication process where a  
3 vote might be actually changed?  
4 MR. QUEENAN: Object to form.  
5 A. You'll have to ask him what specifically he's  
6 referring to with regard to that video and Eric Coomer's  
7 statements.  
8 Q. (By Mr. Cain) You didn't -- you hadn't reviewed  
9 that YouTube video that he's referring to that he -- that  
10 he's talking about Dr. Coomer stating how to change votes?  
11 A. Only afterwards did I understand that he was  
12 referring to a -- a video in which Eric Coomer discussed  
13 what he's talking about.  
14 Q. Okay. That wasn't part of your preshow  
15 investigation or research; correct?  
16 A. No. Correct.  
17 (The video segment was played.)  
18 Q. (By Mr. Cain) Now, this large shareholder part,  
19 that is -- as I think I've heard your testimony -- part of  
20 the importance -- or part of the basis, shall we say, for  
21 the statement that Dr. Coomer would have the ability to  
22 carry out his threat, just like the patents that we talked  
23 about earlier; correct?  
24 MR. QUEENAN: Form.  
25 A. I'd have to go back and refresh my memory of --

Page 106

1 of the context of -- of how you asked me that. But it was  
2 just a piece of the -- of a picture of Eric Coomer being a  
3 high-profile, powerful executive of this company.  
4 Q. (By Mr. Cain) Which as you've stated, I think,  
5 many times now, gave rise to your statement that he would  
6 have the ability to carry out on his threat of election  
7 rigging; true?  
8 A. True.  
9 Q. All right.  
10 (The video segment was played.)  
11 Q. (By Mr. Cain) Okay. Obviously, you go on to --  
12 we've already, kind of, covered that.  
13 But the -- this piece ends, I guess, going on to  
14 Victoria Toensing, if that's how you say her name, which  
15 is one of the Trump lawyers.  
16 As to -- as to Eric Coomer and this story, did  
17 you end up ever reaching out to him or attempt to reach  
18 out to him after this publication to get his side of this  
19 story?  
20 MR. ZAKHEM: Object to form and foundation.  
21 A. I did not.  
22 Q. (By Mr. Cain) I mean, we looked earlier --  
23 let's see if I can bring up the exhibit.  
24 This is back, like we were talking about  
25 earlier, from the Dominion website. Did you reach out

Page 107

1 after this -- well, it was published on the 28th, the  
2 Newsmax piece. Did you reach out to Dominion after you  
3 produced that particular show and it aired?  
4 A. I did not.  
5 Q. As it relates to -- and you didn't go to their  
6 FAQ site either, either before the show or after, did you?  
7 A. You asked me that before, and as I said, I had  
8 seen news stories in which they defended themselves, and  
9 quotes from this website were included.  
10 Q. Okay. Now, here, on the FAQ site, there's a  
11 statement about the fact that Dominion's not shutting its  
12 office and employees have now gone to work remotely. And  
13 it talks about threats to personal safety concerns,  
14 et cetera.  
15 What was your view on publishing both personal  
16 Facebook pictures from Dr. Coomer's account, as you  
17 understood it, and his picture as we saw it on The  
18 Gateway Pundit? Didn't that lead to some concern on your  
19 part that Dr. Coomer might be exposed to threats?  
20 MR. QUEENAN: Object to form and foundation.  
21 A. I shared those Facebook posts because I believed  
22 that the content of the posts were of public interest.  
23 And I believed that they had inherent news value because  
24 they showed an animus and a hostility towards  
25 conservatives and Trump voters and police, and that's why

Page 108

1 I shared them.  
2 Q. (By Mr. Cain) Okay. Did you care about the  
3 impact on Dr. Coomer --  
4 MR. QUEENAN: Object to form.  
5 Q. (By Mr. Cain) -- as a result of your reporting?  
6 A. I couldn't have predicted what the impact on  
7 Eric Coomer is. And every single thing that I've written  
8 over the last 30 years has an impact on somebody.  
9 Q. Yes, it does.  
10 All right. This number two, the reason I'm  
11 showing you this -- again, this is from the Dominion  
12 website. It was published on the 25th before your show  
13 aired.  
14 There's a statement here that "The U.S.  
15 Department of Homeland Security Cyber Security Division  
16 has confirmed that it is not possible for a bad actor to  
17 change election results without detection."  
18 Do you see that?  
19 A. Yes.  
20 Q. Okay. Were you not aware of that statement or  
21 confirmation by Homeland Security; that it would not have  
22 been possible for a bad actor, such as Dr. Coomer, to --  
23 to change results without detection?  
24 A. I don't recall this specific statement. But in  
25 general, just as I mentioned with CISA, I'm not going to

Page 109

1 take at face value any statement that was made by any  
2 government agency about the election at that time.  
3 Q. Okay. Well, who -- who do you consider -- since  
4 you don't consider CISA to be someone that you would rely  
5 on, or the Department of Homeland Security, who do you  
6 think is authoritative that you would rely on?  
7 Russ Ramsland, someone like that?  
8 A. You asked me about these specific agencies, and  
9 I already explained why. Specifically, I had questions  
10 about CISA's conclusions since the very same electronic  
11 voting systems companies that they were watchdogging were  
12 committee members under CISA raised questions about their  
13 objectivity and their liability.  
14 And there are a lot of operatives and  
15 bureaucrats within the Homeland Security department who  
16 have political biases themselves.  
17 So, I mean, I can't -- I would -- I would trust  
18 an independent, nonpartisan -- nonpartisan, not  
19 interest-conflicted agency or neutral academics on making  
20 these kinds of conclusions.  
21 MR. CAIN: All right. I just noticed --  
22 thank you for that.  
23 I just noticed that it appears your counsel may  
24 have been booted off again.  
25 Are you there, Gordon?

Page 110

1 THE VIDEOGRAPHER: He's just coming back in.  
2 MR. CAIN: I tell you what. I know we're still  
3 on the record, and I wish we were off. But this has been  
4 the most technically challenging Zoom deposition since the  
5 beginning of the pandemic.  
6 Gordon, I'm sorry. I just realized that you  
7 were off again.  
8 MR. QUEENAN: That's fine. Do you want to just  
9 do the same thing, where I have a rough idea of how long I  
10 was off, I'll look through the transcript; if I have an  
11 objection, I'll put it in, like, an errata sheet. You  
12 just keep truckin'.  
13 And to the extent it matters -- I mean, I've  
14 been keeping a log of interruptions so we can -- I think  
15 Judge Moses would appreciate us getting done today, and  
16 I'm not going to jam you up saying you had three hours and  
17 because Ms. Malkin froze, you get the short end of the  
18 stick. So I have it at about ten minutes over.  
19 MR. CAIN: Well, just so you know, while you  
20 were gone, the last thing that I talked about was this --  
21 this statement here about the Department of Homeland  
22 Security confirming it's not possible for a bad actor to  
23 change the election results without detection.  
24 Ms. Malkin gave her answer, essentially, that  
25 that department, she thinks, may have a bias or some other

Page 111

1 reason why they're not reliable.  
2 Now my question was, if not the Department of  
3 Homeland Security or CISA, who do you consider to be a  
4 reliable source of information concerning whether or not  
5 it's possible for a bad actor to change election results  
6 without detection.  
7 Q. (By Mr. Cain) And that's my -- that's for you,  
8 Ms. Malkin.  
9 A. And what I answered was some independent entity  
10 that's not attached to divisions of the government, that  
11 work with many of these private companies, that sit on  
12 committees under the umbrella of supposed watchdog  
13 quasi-governmental entities like CISA.  
14 So a neutral academic, somebody who does not  
15 have a stake in the outcome of the election.  
16 MR. CAIN: Okay. Did we lose counsel again?  
17 MR. QUEENAN: No. I'm turning my video off  
18 because I'm concerned that that's part of the problem and  
19 I'm hoping that that will resolve the issue.  
20 So I'm still here. Fire away.  
21 Q. (By Mr. Cain) Can you name one neutral entity,  
22 as you refer to them, that you would consider  
23 authoritative in this respect?  
24 MR. QUEENAN: Object to form.  
25 A. I know that there are watchdogs, particularly

Page 112

1 when it comes to black box voting and -- and these  
2 electronic voting systems, that may not necessarily share  
3 my same political ideology or outlook that are on the  
4 other side of the aisle.  
5 So groups or watchdogs like that that have a  
6 long track record of red-flagging problems with these  
7 systems.  
8 And then I interviewed one of them -- well, I'm  
9 just finishing my answer.  
10 I think somebody like Glen Chong in the  
11 Philippines, who's been doing research on this and dealing  
12 with a -- a lot of these software problems and hardware  
13 problems in another country, is also a credible assessor  
14 of the stability of these systems.  
15 Q. (By Mr. Cain) Okay. Well, let's -- let's stick  
16 to the United States for the time being.  
17 I'm asking you, you don't consider CISA or the  
18 Department of Homeland Security to be authoritative in  
19 this respect, and I just want you to name a group that you  
20 consider that's not Mr. Chong in the Philippines to be  
21 authoritative.  
22 A. Yeah. So as I mentioned, there -- I can't  
23 recall off the top of my head the name of the groups that  
24 have been red-flagging problems with Dominion and Sequoia  
25 and Smartmatic for years prior to Election 2020.

Page 113



<p>1 But they have websites that have documented many</p> <p>2 of these problems. I -- I can go back and find the actual</p> <p>3 names of them, but people who have been tracking many of</p> <p>4 these issues.</p> <p>5 And then I think a lot of the elected officials</p> <p>6 who have elected not to use these types of products</p> <p>7 because of -- of concerns. I believe that Chicago</p> <p>8 Democrats had raised issues about some of these systems,</p> <p>9 for example, and other municipalities that elected not to</p> <p>10 use them.</p> <p>11 Q. Okay. Now, let's look at Number 3. And -- and</p> <p>12 let me frame this for you, ma'am. You made the statement</p> <p>13 on your piece about Dr. Coomer having the ability to -- to</p> <p>14 rig the election. We've talked about that.</p> <p>15 And what I'm trying to drill down on is the</p> <p>16 information that you had available to you to test that</p> <p>17 theory and to validate it.</p> <p>18 And in Number 3 here, this is a discussion about</p> <p>19 certification by the U.S. Election Assistant Commission.</p> <p>20 And I'll just read it quickly.</p> <p>21 It says, "All U.S. voting systems must provide</p> <p>22 assurances that they work accurately and reliably as</p> <p>23 intended under Federal USEAC and state certifications and</p> <p>24 testing requirements. Dominion Voting Systems are</p> <p>25 certified for the 2020 elections."</p> <p style="text-align: right;">Page 114</p>	<p>1 raise their voices to ask their elected officials to ask</p> <p>2 these questions could do so.</p> <p>3 Q. (By Mr. Cain) Well, you agree with me, ma'am,</p> <p>4 that Dominion, the company that Dr. Coomer is part of,</p> <p>5 they don't actually conduct the elections; right? You</p> <p>6 know that?</p> <p>7 MR. QUEENAN: Object to form.</p> <p>8 Q. (By Mr. Cain) Do you know that to be true?</p> <p>9 A. They're an integral and fundamental part of the</p> <p>10 conducting of our elections. They do not conduct them qua</p> <p>11 conducting, if that's what you mean.</p> <p>12 Q. What I mean to say is, the actual elections are</p> <p>13 conducted by both the state and county officials; right?</p> <p>14 Do you know that?</p> <p>15 MR. QUEENAN: Object to form and foundation.</p> <p>16 A. Yes. That's how it's supposed to work, yes.</p> <p>17 Q. (By Mr. Cain) Okay.</p> <p>18 THE VIDEOGRAPHER: Counsel, five minutes,</p> <p>19 heads-up.</p> <p>20 MR. QUEENAN: Charlie, do you want to just make</p> <p>21 it 15? Will that make it fair in terms of the</p> <p>22 interruptions?</p> <p>23 MR. CAIN: Sure. We'll figure it out.</p> <p>24 Q. (By Mr. Cain) But do you, as you sit here --</p> <p>25 I'm just trying to mine your knowledge. Do you think</p> <p style="text-align: right;">Page 116</p>
<p>1 And then it has some bullet points.</p> <p>2 "Servers that run Dominion software are located</p> <p>3 in local election offices and data never leaves control of</p> <p>4 the local election officials."</p> <p>5 All right. Were you aware of that, or do you</p> <p>6 have some basis to dispute that?</p> <p>7 MR. QUEENAN: Object to form and foundation.</p> <p>8 A. I was generally aware of these requirements,</p> <p>9 yes.</p> <p>10 Q. (By Mr. Cain) Okay.</p> <p>11 "Dominion does not have the ability to review</p> <p>12 votes in real-time as they are submitted. Dominion's</p> <p>13 software does not have the ability to fractionalize for</p> <p>14 weight votes. Dominion tabulators do not have an exposed</p> <p>15 USB or other memory ports."</p> <p>16 Did I read that correctly?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. So given those statements, how would</p> <p>19 someone like Dr. Coomer penetrate the U.S. election system</p> <p>20 without detection?</p> <p>21 MR. QUEENAN: Object to form and foundation.</p> <p>22 A. Like I said, I am not a technical expert in</p> <p>23 election software or hardware. And that is why I was</p> <p>24 raising these questions; so that citizens out there who</p> <p>25 might have more expertise than I do or the ability to</p> <p style="text-align: right;">Page 115</p>	<p>1 Dr. Coomer or Dominion employees participate in the actual</p> <p>2 election? In other words, are they acting as tabulators?</p> <p>3 MR. QUEENAN: Object to form.</p> <p>4 A. I -- I -- I don't know. I -- I don't know</p> <p>5 what -- I don't know the totality of what happened during</p> <p>6 the last election cycle.</p> <p>7 But in general, the tabulators are not the</p> <p>8 people who conduct the elections.</p> <p>9 Q. (By Mr. Cain) Well, let's take an example. If</p> <p>10 you'd have read through this before airing the last piece</p> <p>11 you did on Dr. Coomer, it says, "Dominion employees do not</p> <p>12 have access to the ballot adjudication system nor do they</p> <p>13 operate it."</p> <p>14 Do you have any basis to dispute that?</p> <p>15 MR. QUEENAN: Object to form and foundation.</p> <p>16 A. I don't have any basis one way or the other.</p> <p>17 Q. (By Mr. Cain) And you didn't do any research</p> <p>18 prior to the Coomer story on the -- on the 28th as to</p> <p>19 whether or not Dr. Coomer specifically had access to the</p> <p>20 adjudication system during the election, did you?</p> <p>21 MR. HICKS: Object to form.</p> <p>22 A. That's not a claim that I made.</p> <p>23 Q. (By Mr. Cain) Well, you said that he had the</p> <p>24 ability to do it. So part of the ability is opportunity,</p> <p>25 and that's why I'm asking you this question.</p> <p style="text-align: right;">Page 117</p>

1 Did he have the opportunity, through access, to  
2 affect the election? And my -- and that's the basis of my  
3 question. Either you know that or you don't. Do you  
4 know?  
5 MR. QUEENAN: Object to form.  
6 A. When I stated that he had the ability to have an  
7 influence on the election, I did not spell out, nor did I  
8 have any particular theory about how he might have done  
9 that.  
10 Joe Oltmann apparently did, and others did. And  
11 you can ask them to spell out how exactly they believe it  
12 happened.  
13 But as I stated on the show, I had no evidence  
14 at the time that he acted on that threat, and that's what  
15 I told my audience.  
16 Q. (By Mr. Cain) Right. Just that he had the  
17 ability to do it. That's why I'm asking.  
18 MR. QUEENAN: Object to form and foundation.  
19 Q. (By Mr. Cain) Let me ask you this: Were you --  
20 actually, back up before I move on to that.  
21 And I had asked you previously about Mr. Hof  
22 and some of the other defendants in this case. I didn't  
23 ask you about Mr. Giuliani.  
24 Did -- did you have any interactions with  
25 Mr. Giuliani during the 2020 election cycle in -- in this  
Page 118

1 period of time?  
2 MR. QUEENAN: Object to form.  
3 A. No.  
4 Q. (By Mr. Cain) I noticed that you were at -- I  
5 think you spoke -- correct me if I'm wrong -- at a  
6 Stop the Steal rally in November -- late November, so it  
7 would have been a couple of weeks after -- well, it would  
8 have been a couple of days after the Newsmax piece aired.  
9 But do you recall speaking at the Stop the Steal  
10 rally in -- I think it was Phoenix, on November 30th?  
11 A. Yes. I spoke very briefly at the phoenix  
12 Stop the Steal rally.  
13 Q. Okay. And that was outside of -- was -- was  
14 Ali Alexander also speaking at that --  
15 MR. QUEENAN: Object to form. What name did you  
16 say?  
17 Q. (By Mr. Cain) Ali Alexander.  
18 Was he there?  
19 A. Yes.  
20 Q. And was Mr. Giuliani, at the time, was this  
21 coordinated with him speaking to the legislature there  
22 in -- in Arizona?  
23 MR. QUEENAN: Object to --  
24 A. I wouldn't know any -- oh.  
25 MR. QUEENAN: You can answer.  
Page 119

1 A. I wouldn't know anything about who coordinated  
2 what.  
3 Q. (By Mr. Cain) Okay. Well, the reason I was  
4 asking you is I saw there was a fair number of tweets by  
5 you directed towards Mr. Giuliani. Do you remember doing  
6 that?  
7 A. Directed towards him? I don't -- I don't know  
8 what you mean by that.  
9 Q. Well, I'm not a Twitter guy, so I don't --  
10 you're tweeting about Mr. Giuliani during this particular  
11 rally. Do you remember that?  
12 A. Yes. I was there not only to speak but also to  
13 cover the hearing. And so I tagged the people who are  
14 speaking, and he was one of them.  
15 Q. By the way, I -- okay. So you didn't meet with  
16 him or talk to him during that Arizona visit, did you?  
17 A. I did not.  
18 Q. Okay. And the Stop the Steal, is that an  
19 organization in the sense of Antifa, or does it have some  
20 actual, you know, organizational structure that you know  
21 of?  
22 MR. QUEENAN: Object to form and foundation.  
23 Q. (By Mr. Cain) And I butchered that a little  
24 bit.  
25 I'm just -- I'm trying to figure out what that  
Page 120

1 organization is, if you know.  
2 A. So I believe it was formed in the aftermath of  
3 the election to galvanize people to show up at rallies,  
4 and I had a lot of friends who were participating in them.  
5 I don't know much about the organization itself.  
6 Q. And do you have a -- a firmly held belief,  
7 ma'am, that the 2020 presidential election was stolen?  
8 A. As I stated at the beginning, I believe broadly  
9 that there were a number of irregularities, problems with  
10 ballot harvesting and the intervention of private  
11 philanthropic nonprofits that led to what I believe  
12 broadly was a stealing of Election 2020. Absolutely.  
13 Q. Okay. And is that -- I'm just trying to  
14 understand the -- how you're characterizing it.  
15 Does that mean -- when you say "stealing," does  
16 that mean that there were activities that affected the  
17 vote count to the point where the wrong person won?  
18 A. Yes.  
19 Q. We'll just do one more exhibit since we're --  
20 and I apologize, Ms. Malkin. Have you done one of these  
21 Zoom depositions before?  
22 A. I did one, yes, one other one, and also had  
23 similar problems. It's -- it's crunch time, like, in our  
24 neighborhood, so a lot of people are on the internet. I  
25 told my son to get off.  
Page 121

<p>1 (Exhibit Number 30 was introduced.)</p> <p>2 Q. (By Mr. Cain) All right. Let me share my</p> <p>3 screen. This is Exhibit 30. This is from your Newsmax</p> <p>4 Sovereign Nation show on May 8, 2021. It's about a minute</p> <p>5 and a half. Take a look at Exhibit 30.</p> <p>6 (The video segment was played.)</p> <p>7 Q. (By Mr. Cain) Had you seen that before,</p> <p>8 Ms. Malkin?</p> <p>9 A. Yes.</p> <p>10 Q. All right. So you differed from your former --</p> <p>11 were they an employer? I want to refer to them as -- in</p> <p>12 the appropriate term.</p> <p>13 A. They --</p> <p>14 Q. What was Newsmax to you?</p> <p>15 A. They do not employ me. I was an independent</p> <p>16 contractor.</p> <p>17 Q. You had just told us that the election was</p> <p>18 stolen, in your view. And you, obviously, understand from</p> <p>19 seeing that piece that Newsmax had found no evidence of</p> <p>20 that and made that statement to the public; true?</p> <p>21 MR. QUEENAN: Object to form.</p> <p>22 A. What is the question?</p> <p>23 Q. (By Mr. Cain) Yeah. You had told us that the</p> <p>24 election, in your view, was stolen. But you would agree</p> <p>25 that your independent contractor company, Newsmax, made</p> <p style="text-align: right;">Page 122</p>	<p>1 reveal anything that's privileged information.</p> <p>2 Q. Okay. Well --</p> <p>3 A. I don't -- I don't know how to handle ensuring</p> <p>4 that I don't disclose privileged information or</p> <p>5 information that's covered by an NDA.</p> <p>6 Q. Okay. Well, I don't know your NDA situation.</p> <p>7 Let me ask it this way.</p> <p>8 Let's just talk about the topic without going</p> <p>9 into the detail. So you understand, topic, substance.</p> <p>10 We're going to talk about a topic.</p> <p>11 Did the topic or the issue of whether you were</p> <p>12 going to be given input into the retraction -- was that</p> <p>13 topic ever discussed or addressed without going into the</p> <p>14 details?</p> <p>15 A. It was broached with me, yes.</p> <p>16 Q. Did you provide, without going into substance,</p> <p>17 any input into the retraction that Newsmax issued?</p> <p>18 A. Yes.</p> <p>19 MR. QUEENAN: Object to form.</p> <p>20 Q. (By Mr. Cain) And your input, was that through</p> <p>21 counsel? What -- what was the setting?</p> <p>22 MR. QUEENAN: I think I'm going to have to</p> <p>23 interpose a privilege objection here because this would be</p> <p>24 derived from attorney-client communications, Charlie.</p> <p>25 MR. CAIN: Well, I -- if that's true --</p> <p style="text-align: right;">Page 124</p>
<p>1 the statement to the public to the opposite effect?</p> <p>2 MR. QUEENAN: Object to form.</p> <p>3 A. You're asking me if I agreed that they came to</p> <p>4 an opposite conclusion about the election?</p> <p>5 Q. (By Mr. Cain) Yeah. You -- well, I can ask it</p> <p>6 a different -- Newsmax doesn't agree with your position</p> <p>7 that the election was stolen, at least as -- as it relates</p> <p>8 to this retraction; correct?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And is that why you guys parted ways,</p> <p>11 because of differing views on the election?</p> <p>12 MR. QUEENAN: Object to form and foundation.</p> <p>13 Asked and answered.</p> <p>14 You can answer.</p> <p>15 A. As I mentioned, there were many reasons beyond</p> <p>16 this particular issue that I voluntarily ended my</p> <p>17 relationship with Newsmax.</p> <p>18 Q. (By Mr. Cain) Did they consult you prior to</p> <p>19 issuing this retraction for your input?</p> <p>20 MR. QUEENAN: Object to form.</p> <p>21 Q. (By Mr. Cain) Did they?</p> <p>22 A. So --</p> <p>23 Q. Did Newsmax consult you --</p> <p>24 A. Yeah. I understand the question. I understand</p> <p>25 the question. I'm just trying to make sure that I don't</p> <p style="text-align: right;">Page 123</p>	<p>1 MR. QUEENAN: Well, I think it's a fair topic.</p> <p>2 I'm just trying to think of a way to ask the question</p> <p>3 where it's not running afoul of privilege.</p> <p>4 Q. (By Mr. Cain) Well, let me ask it this way,</p> <p>5 ma'am. As it relates to the retraction, did you have any</p> <p>6 discussions directly with Newsmax without lawyers present</p> <p>7 about this topic?</p> <p>8 A. I was contacted inappropriately by a nonlawyer</p> <p>9 about the retraction.</p> <p>10 Q. Someone at Newsmax?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. While you had counsel?</p> <p>13 A. Correct.</p> <p>14 Q. All right. Okay. Well, we'll save that for</p> <p>15 another day. I don't think it matters for our purposes at</p> <p>16 this point.</p> <p>17 Have you issued any retractions concerning your</p> <p>18 reporting on Dr. Coomer?</p> <p>19 A. I have not.</p> <p>20 Q. And in terms of your ability now, in hindsight,</p> <p>21 to corroborate any of your reporting, have you done</p> <p>22 anything since the November 28th broadcast that would</p> <p>23 corroborate Mr. Oltmann's story that Dr. Coomer was on</p> <p>24 this Antifa conference call?</p> <p>25 A. I have not followed up because I have not done</p> <p style="text-align: right;">Page 125</p>

<p>1 any further stories on it.</p> <p>2 MR. QUEENAN: And -- and, Charlie, that's</p> <p>3 three hours and ten minutes, I think. Is that correct,</p> <p>4 Dennis?</p> <p>5 THE VIDEOGRAPHER: With a running total, yes. I</p> <p>6 have three hours and nine minutes and some seconds.</p> <p>7 MR. QUEENAN: So a couple more questions, then.</p> <p>8 Q. (By Mr. Cain) You recognize, ma'am, that if --</p> <p>9 if what Mr. Olmann claims is true, then there are other</p> <p>10 witnesses to this event. You recognize that fact; right?</p> <p>11 MR. QUEENAN: Object to form.</p> <p>12 A. To which event are you referring?</p> <p>13 Q. (By Mr. Cain) The supposed Antifa call that</p> <p>14 Dr. Coomer was on.</p> <p>15 A. Yes, that would be true.</p> <p>16 Q. Right. And none of those witnesses have been</p> <p>17 interviewed by you; correct?</p> <p>18 A. Correct.</p> <p>19 Q. Or anyone, to your knowledge, working for you?</p> <p>20 A. I don't have anyone working for me.</p> <p>21 MR. QUEENAN: And I think that's time, Charlie.</p> <p>22 You tell me if you think I'm wrong. I don't want to -- I</p> <p>23 don't want to have to go to Judge Moses with a dispute,</p> <p>24 but I -- I think ten minutes kind of encapsulated the</p> <p>25 technical difficulties.</p> <p>Page 126</p>	<p>1 you sit here, you think that you may have misspoken and</p> <p>2 you need to correct today?</p> <p>3 A. I've answered to the best of my ability.</p> <p>4 MR. CAIN: Okay. Well, thank you. I apologize</p> <p>5 for the disruption on my -- my text. My wife had texted</p> <p>6 during one of your questions that the plumber has arrived.</p> <p>7 I'm going to go attend to that.</p> <p>8 Thank you for your time, ma'am.</p> <p>9 THE WITNESS: Sure.</p> <p>10 THE REPORTER: Counsel, before we all</p> <p>11 disconnect, I do need to --</p> <p>12 THE VIDEOGRAPHER: Just one -- one second.</p> <p>13 Any follow-up, Counsel?</p> <p>14 MR. QUEENAN: No.</p> <p>15 THE VIDEOGRAPHER: Okay. We are off the record</p> <p>16 at 1:43 p.m., and this concludes today's testimony given</p> <p>17 by Michelle Malkin.</p> <p>18 The total number of media units used was two and</p> <p>19 will be retained by Veritext Legal Solutions. Thank you,</p> <p>20 all. And please stay online for the court reporter.</p> <p>21 (The video record was concluded.)</p> <p>22 THE REPORTER: Yes. Counsel, I just need to get</p> <p>23 any transcript orders on the record, including any</p> <p>24 rough-draft requests and any expedited requests.</p> <p>25 And I will start with Mr. Cain.</p> <p>Page 128</p>
<p>1 Do you disagree?</p> <p>2 MR. CAIN: I don't know. This has been one of</p> <p>3 the more disruptive and disrupted Zoom depositions in the</p> <p>4 history of (unintelligible).</p> <p>5 MR. QUEENAN: Was I've been doing was basically</p> <p>6 keeping a sort of an injury time of -- every time there</p> <p>7 was a disruption, I wrote down and added a minute. And</p> <p>8 then I came up with seven of those.</p> <p>9 And then there was two times where I dropped</p> <p>10 off, and when I came back on, you had to -- we had to have</p> <p>11 a conversation about that. So I figured that worked out</p> <p>12 to another three minutes. That puts us at three hours and</p> <p>13 ten minutes.</p> <p>14 I mean --</p> <p>15 MR. CAIN: So let me do this.</p> <p>16 MR. QUEENAN: Is it --</p> <p>17 (Simultaneous speakers.)</p> <p>18 MR. CAIN: Let me wrap it up.</p> <p>19 Q. (By Mr. Cain) Ms. Malkin, have -- have I been</p> <p>20 professional and courteous -- and courteous to you today?</p> <p>21 A. Mostly.</p> <p>22 Q. Okay. As you sit here -- I've asked you a</p> <p>23 number of questions. Are there any responses that you</p> <p>24 have given that, upon reflection -- and you'll have an</p> <p>25 opportunity to -- to look at -- at the transcript, but as</p> <p>Page 127</p>	<p>1 MR. CAIN: I think we have a three-day standing</p> <p>2 order.</p> <p>3 THE REPORTER: Okay.</p> <p>4 MR. CAIN: And we're going to need a good video</p> <p>5 editor; I know that.</p> <p>6 THE REPORTER: Is that it for orders? No more</p> <p>7 orders at this point?</p> <p>8 MR. QUEENAN: I -- I would like an electronic</p> <p>9 transcript just to the -- I don't need the video right</p> <p>10 now, just the transcript, four pages a page, if that's</p> <p>11 possible, please.</p> <p>12 THE REPORTER: Yes. And will you handle</p> <p>13 signature for Ms. Malkin as well?</p> <p>14 MR. QUEENAN: Yes, ma'am.</p> <p>15 THE REPORTER: Okay.</p> <p>16 MS. HALL: And, Sara, this is Andrea Hall. I</p> <p>17 don't know if you saw in the chat, but I will take a copy</p> <p>18 of the transcript as well.</p> <p>19 MR. QUEENAN: Ms. Malkin, you're free to --</p> <p>20 you're -- you're released.</p> <p>21 THE WITNESS: Thank you.</p> <p>22 MR. ZAKHEM: This is John Zakhem. I'd like an</p> <p>23 electronic copy as well.</p> <p>24 MR. ARRINGTON: Barry Arrington, electronic</p> <p>25 copy, please.</p> <p>Page 129</p>




1 MR. RHODES: Bernie Rhodes for OAN. Electronic  
2 copy, please.  
3 THE REPORTER: Anybody else? Okay.  
4 Thank you, all.  
5 MR. CAIN: Thanks, Sara.  
6 THE REPORTER: You bet.  
7 MS. DOMINGUEZ: All right. You all have a good  
8 evening.  
9 THE REPORTER: Thanks, Rebecca.  
10 MS. DOMINGUEZ: Thank you.  
11 MS. CHRISTOPHER: Hi, there. Sorry. My name is  
12 Lexi Christopher. I am here on behalf of Mr. Corporon. I  
13 am his legal assistant.  
14 I just needed to request a transcript. But I  
15 had some internet trouble, and so I, kind of, got kicked  
16 out and came back in.  
17 THE REPORTER: No worries.  
18 MS. CHRISTOPHER: But if we can request a  
19 transcript. He asked for four to a page and a full  
20 concordance, if you guys can do that.  
21 THE REPORTER: I can do that. Thank you, Lexi.  
22 \* \* \* \* \*  
23 WHEREUPON, the foregoing deposition was  
24 concluded at 1:43 p.m. Total time on the record was  
25 3 hours and 33 minutes.

Page 130

1 I, MICHELLE MALKIN, the deponent in the above  
2 deposition, do hereby acknowledge that I have read the  
3 foregoing transcript of my testimony, and state under oath  
4 that it, together with any attached Amendment to  
5 Deposition pages, constitutes my sworn testimony.  
6  
7 I have made changes to my deposition  
8 I have NOT made any changes to my deposition  
9  
10  
11 MICHELLE MALKIN  
12  
13 Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_,  
14 \_\_\_\_\_, 20\_\_\_\_.  
15 My commission expires: \_\_\_\_\_.  
16  
17 NOTARY PUBLIC  
18  
19  
20  
21  
22  
23  
24  
25

Page 131

1 REPORTER'S CERTIFICATE  
2 STATE OF COLORADO )  
3 CITY AND COUNTY OF DENVER )  
4 I, Sara A. Stueve, a Registered Professional Reporter  
5 and Notary Public within and for the State of Colorado,  
6 commissioned to administer oaths, do hereby certify that  
7 previous to the commencement of the examination, the  
8 witness was duly sworn by me to testify the truth in  
9 relation to matters in controversy between the said  
10 parties; that the said deposition was taken in stenotype  
11 by me at the time and place aforesaid and was thereafter  
12 reduced to typewritten form by me; and that the foregoing  
13 is a true and correct transcript of my stenotype notes  
14 thereof; that I am not an attorney nor counsel nor in any  
15 way connected with any attorney or counsel for any of the  
16 parties to said action nor otherwise interested in the  
17 outcome of this action.  
18 My commission expires \_\_\_\_\_, 2024.  
19  
20   
21 SARA A. STUEVE  
22 Registered Professional Reporter  
23 Notary Public, State of Colorado  
24  
25

Page 132

1 Coomer, Eric, Ph.D v. Donald J. Trump For President, Inc.  
2 Michelle Malkin Job No. 4691504  
3 ERRATA SHEET  
4 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_  
5 \_\_\_\_\_  
6 REASON \_\_\_\_\_  
7 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_  
8 \_\_\_\_\_  
9 REASON \_\_\_\_\_  
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22 \_\_\_\_\_  
23 \_\_\_\_\_  
24 Michelle Malkin Date \_\_\_\_\_  
25

Page 133

34 (Pages 130 - 133)

1 gqueenan@prpclegal.com  
2 July 30, 2021  
3 Coomer, Eric, Ph.D v. Donald J. Trump For President, Inc.  
4 DEPOSITION OF: Michelle Malkin 4691504  
5 The above-referenced witness transcript is  
6 available for read and sign.  
7 Within the applicable timeframe, the witness  
8 should read the testimony to verify its accuracy. If  
9 there are any changes, the witness should note those  
10 on the attached Errata Sheet.  
11 The witness should sign and notarize the  
12 attached Errata pages and return to Veritext at  
13 errata-tx@veritext.com.  
14 According to applicable rules or agreements, if  
15 the witness fails to do so within the time allotted,  
16 a certified copy of the transcript may be used as if  
17 signed.  
18 Yours,  
19 Veritext Legal Solutions  
20  
21  
22  
23  
24  
25

Page 134

35 (Page 134)

Colorado Rules of Civil Procedure  
Chapter 4, Disclosure and Discovery

Rule 30

(e) Review by Witness; Changes; Signing. If requested by the deponent or a party before completion of the deposition, the deponent shall be notified by the officer that the transcript or recording is available. Within 35 days of receipt of such notification the deponent shall review the transcript or recording and, if the deponent makes changes in the form or substance of the deposition, shall sign a statement reciting such changes and the deponent's reasons for making them and send such statement to the officer. The officer shall indicate in the certificate prescribed by subsection (f)(1) of this rule whether any review was requested and, if so, shall append any changes made by the deponent.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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4691504 - ER

DISTRICT COURT, CITY AND COUNTY OF DENVER  
STATE OF COLORADO  
1437 Bannock Street  
Denver, CO 80202

^ COURT USE ONLY ^

ERIC COOMER, Ph.D.,  
Plaintiff,

Case Number 20CV34319

Courtroom 409

vs.

DONALD J. TRUMP FOR PRESIDENT, INC.,  
SIDNEY POWELL, SIDNEY POWELL, P.C.,  
RUDOLPH GIULIANI, JOSEPH OLTMANN,  
FEC UNITED, SHUFFLING MADNESS MEDIA, INC.,  
dba CONSERVATIVE DAILY, JAMES HOFT,  
TGP COMMUNICATIONS LLC, dba THE GATEWAY PUNDIT,  
MICHELLE MALKIN, ERIC METAXAS, CHANEL RION,  
HERRING NETWORKS, INC., dba ONE AMERICA  
NEWS NETWORK, and NEWSMAX MEDIAN, INC.,  
Defendants.

VIDEO-RECORDED REMOTE DEPOSITION OF  
MICHELLE MALKIN

July 27, 2021

REMOTE APPEARANCES:

FOR THE PLAINTIFF:

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Page 1

REPORTER'S CERTIFICATE

STATE OF COLORADO                     )  
CITY AND COUNTY OF DENVER         )

I, Sara A. Stueve, a Registered Professional Reporter and Notary Public within and for the State of Colorado, commissioned to administer oaths, do hereby certify that previous to the commencement of the examination, the witness was duly sworn by me to testify the truth in relation to matters in controversy between the said parties; that the said deposition was taken in stenotype by me at the time and place aforesaid and was thereafter reduced to typewritten form by me; and that the foregoing is a true and correct transcript of my stenotype notes thereof; that I am not an attorney nor counsel nor in any way connected with any attorney or counsel for any of the parties to said action nor otherwise interested in the outcome of this action.

My commission expires October 26, 2024.



SARA A. STUEVE

Registered Professional Reporter  
Notary Public, State of Colorado

1 I, MICHELLE MALKIN, the deponent in the above  
2 deposition, do hereby acknowledge that I have read the  
3 foregoing transcript of my testimony, and state under oath  
4 that it, together with any attached Amendment to  
5 Deposition pages, constitutes my sworn testimony.

6 ☒

7 I have made changes to my deposition

8 ☐

9 I have NOT made any changes to my deposition

10 

11 MICHELLE MALKIN

12  
13 Subscribed and sworn to before me this 26<sup>th</sup> day of

14 August

2021.

15 My commission expires: \_\_\_\_\_

16  
17 \_\_\_\_\_  
18 NOTARY PUBLIC

1 Coomer, Eric, Ph.D v. Donald J. Trump For President, Inc.  
2 Michelle Malkin Job No. 4691504

3 E R R A T A S H E E T

4 PAGE 38 LINE 5 CHANGE "its" to "it's"

5  
6 REASON typo  
7 PAGE 52 LINE 15 CHANGE "vitreal" to "vitriol"

8  
9 REASON TYPO  
10 PAGE 60 LINE 21 CHANGE "animas" to "animus"

11  
12 REASON typo  
13 PAGE 65 LINE 22 CHANGE "15" to "50"

14  
15 REASON Typo  
16 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

17  
18 REASON \_\_\_\_\_  
19 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

20  
21 REASON \_\_\_\_\_

22 MMK  
23

8/26/21  
Date

24 Michelle Malkin

1 But that's just one aspect of it. I've covered  
2 election fraud, as I mentioned, over the last 30 years.  
3 And it's the entire mountain of everything from  
4 illegal-alien fraud, fraud that was catalyzed by the motor  
5 voter law, <sup>1</sup>its obstruction of GOP poll workers.

6 And I had interviewed one of them in Michigan.  
7 It had to do with a -- a lot of the training that I  
8 believe was done by partisan figures and electronic voting  
9 systems and the weaknesses and the -- the problems with  
10 those, which have been highlighted by, as I said, people  
11 on both the left and the right, is part of that larger  
12 picture of the stealing of an election.

13 Q. And that's how you framed the story that you  
14 were doing on -- on Eric Coomer on this live stream,  
15 though; that he -- that this was part of this systemic  
16 stealing of the election; true?

17 A. Correct.

18 Q. And you wanted the viewers to know that -- that  
19 Eric Coomer was potentially instrumental in the stealing  
20 of the 2020 presidential election; true?

21 A. I wanted people to hear what Joe Oltmann had  
22 discovered about him, and why he felt it was important and  
23 germane to the public discussion of how the election was  
24 run, yes.

25 Q. Okay. And you didn't talk about -- I mean, this

1 So if that's true, then -- then how are you  
2 sitting here linking a political viewpoint with one's  
3 ability to administer or serve in a -- in an election  
4 role? I don't get it.

5 MR. QUEENAN: Object to form.

6 You can answer.

7 A. What's the question?

8 Q. (By Mr. Cain) Who cares? Maybe he didn't like  
9 Donald Trump. What does that have to do with election  
10 integrity?

11 A. Joe Oltmann explains why he believes it is  
12 relevant, and I agree with him; that it is concerning that  
13 the sheaf of Facebook posts that not merely express some  
14 di minimus level of discontent but are actually very  
15 extreme and profane in vitreal and even hatred for people  
16 who are on the right, is of great public interest to  
17 voters who were concerned about how Election 2020 was  
18 conducted.

19 Q. And so that's why you chose to -- to put up the  
20 Facebook posts during this live stream?

21 MR. QUEENAN: Object to form.

22 Q. (By Mr. Cain) Is that why?

23 A. Yes. Eric Coomer was a high-level official for  
24 Dominion Voting Systems whose products are used in almost,  
25 what, 30 states in the country. Dominion was at the



1 Go ahead and answer.

2 THE WITNESS: Sorry. Sorry. I'll wait a little  
3 bit more.

4 A. That was Joe Oltmann's opinion, and I -- I  
5 agreed with the sentiment of it, yes.

6 Q. (By Mr. Cain) Well, that's not an opinion.  
7 Being a major shareholder is not an opinion, is it?

8 A. No. The idea that being a major shareholder  
9 could lend itself to the dangers of sabotaging election  
10 integrity. That's an opinion. And I agree with that  
11 underlying sentiment --

12 Q. Yeah.

13 A. -- that it was --

14 Q. And conversely, if Dr. Coomer is not a major  
15 shareholder, then the opposite would be true; right? That  
16 he wouldn't have the -- the amount of influence over the  
17 corporate entity that a major shareholder would; fair?

18 MR. QUEENAN: Object to form and foundation.

19 A. Well, it was certainly a piece of the puzzle,  
20 you know, given -- given his high profile in the company,  
21 plus that, plus the animas that he manifested in the -- in  
22 the Facebook posts. It was all of it.

23 Q. (By Mr. Cain) You doing okay, ma'am? Do you  
24 need a break?

25 A. I'm fine.

1 Q. Okay.

2 A. -- done anything else, but that's my  
3 recollection.

4 Q. Because I -- and correct me if I'm wrong, I only  
5 know of these two, at least in this medium: A live stream  
6 on the 13th, and then the Newsmax piece on the 28th.

7 A. Correct.

8 Q. Okay. And then after the 28th, you did not do  
9 any more stories that directly related to Dr. Coomer;  
10 right?

11 A. Correct.

12 Q. Is there a reason why you stopped reporting on  
13 this?

14 A. I --

15 Q. Just moved on?

16 A. I -- I do tons of stories on tons of topics.

17 Q. But you just moved on?

18 A. Well, I think that the two stories covered  
19 everything that needed to be said about what Joe Oltmann  
20 had discovered about Eric Coomer and his role at Dominion.

21 Q. Well --

22 A. The live stream was 15 minutes and a full  
23 segment on Newsmax.

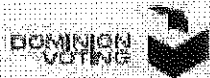
24 Q. Okay. Now, let's -- let's talk about the  
25 intervening two weeks, approximately two weeks between the

REPORTER'S NOTE:

EXHIBIT 15

Video File

PRESERVED IN NATIVE FORMAT



HOME ABOUT PRODUCTS SUPPORT SECURITY CAREERS CONTACT

Exhibit  
 PLTF 0016  
 MALKIN

Updated: November 13, 2020

## SETTING THE RECORD STRAIGHT: FACTS & RUMORS

# DOMINION VOTING SYSTEMS CATEGORICALLY DENIES FALSE ASSERTIONS ABOUT VOTE SWITCHING ISSUES WITH OUR VOTING SYSTEMS.

According to a Joint Statement by the federal government agency that oversees U.S. election security, the Department of Homeland Security's Cybersecurity & Infrastructure Security Agency (CISA): "There is no evidence that any voting system deleted or lost votes, changed votes, or was in any way compromised." The government & private sector councils that support this mission called the 2020 election "the most secure in American history."

## 1) VOTE DELETION/SWITCHING ASSERTIONS ARE COMPLETELY FALSE.

An unsubstantiated claim about the deletion of 2.7 million pro-Trump votes that was posted on the Internet and spread on social media has been taken down and debunked by independent fact-checkers.

- Edison Research (ER) has refuted any claims that company data suggests any voting irregularities, including vote switching. ER President Larry Rosin told The Dispatch Fact Check, "Edison Research created no such report and we are not aware of any voter fraud."
- Claims that 941,000 votes for President Trump in Pennsylvania were deleted are impossible, as Dominion only serves 14 Commonwealth counties. Collectively, those Counties produced 1.3 million votes representing a voter turnout of 76%. Fifty-two percent of those votes went to President Trump, which amounts to 676,000 votes the company's system processed for the President in Pennsylvania.

## 2) DOMINION IS A NONPARTISAN U.S. COMPANY.

Dominion has no company ownership relationships with any member of the Pelosi family, the Feinstein family, or the Clinton Global Initiative, Smartmatic, or any ties to Venezuela. Dominion works with all political parties; our customer base and our government outreach practices reflect this nonpartisan approach.

- As reported by the Associated Press, "Dominion made a one-time philanthropic commitment at a Clinton Global Initiative meeting in 2014, but the Clinton Foundation has no stake or involvement in Dominion's operations, the nonprofit confirmed." The meeting included bipartisan attendees focused on international democracy-building.

## 3) DOMINION SOFTWARE ACCURATELY TABULATED BALLOTS, AND TABULATED RESULTS ARE 100% AUDITABLE.

No credible reports or evidence of any software issues exist. Dominion equipment is used by county and state officials to tabulate ballots. Human errors related to reporting tabulated results have arisen in a few counties, including some using Dominion equipment, but appropriate corrections were made prior to the canvass process. More importantly, states have taken appropriate steps to review all reported issues.

- The Michigan Secretary of State's office offers a Fact Check Page which debunks false or erroneous claims about voting in Detroit, as well as a user-error incident in Antrim County.
- The Georgia Secretary of State has also repeatedly stated throughout the count that "[a]s the work goes on, I want to assure Georgia voters that every legal vote was cast and accurately counted."



## 4) NO UNAUTHORIZED OR LAST-MINUTE SOFTWARE UPDATES OCCURRED.

Claims about software updates being done the night before Election Day are 100% false.

- Georgia Voting System Implementation Manager Gabe Sterling has independently, and unequivocally, rebutted inaccurate claims made about an update to machines on the eve of the election. He affirmed in his daily press briefing on November 9 that "nothing was done to the [PollPad] system after [October 31]," when voter files were updated as part of normal procedure.

## 5) THERE ARE NO ISSUES WITH THE USE OF SHARPIE PENS.

Election officials provide writing instruments that are approved for marking ballots to all in-person voters using hand-marked paper ballots. Dominion Voting Systems machines can read all of these instruments, including Sharpies.

- The DHS Cybersecurity and Infrastructure Security Agency, "if a ballot has issues that impacts its ability to be scanned, it can be hand counted." The Mericopa County Board of Supervisors assured voters that "sharpies do not invalidate ballots." Dominion has stated that "Sharpie pens are safe and reliable to use on ballots, and recommended due to their quick-drying ink."

## 6) ASSERTIONS OF VOTER FRAUD CONSPIRACIES ARE 100% FALSE.

- The U.S. Department of Homeland Security's Cybersecurity and Infrastructure Security Agency (CISA) has debunked numerous claims, including claims about the existence of a secret CIA program for vote fraud called Hammer and Scorecard.

All U.S. voting systems must provide assurance that they work accurately and reliably as intended under federal U.S. EAC and state certification and testing requirements. Election safeguards - from testing and certification of voting systems, to canvassing and auditing - prevent malicious actors from tampering with vote counts and ensure that final vote tallies are accurate. Read more from the U.S. Department of Homeland Security's Cybersecurity and Infrastructure Security Agency.



Founded in 2003, Dominion Voting Systems is a leading industry supplier of election technology across the U.S., Canada and globally.

### PRODUCTS

END-TO-END  
Democracy Suite®

IN-PERSON AND ACCESSIBLE VOTING  
ImageCast® X

CENTRAL TABULATION  
ImageCast® Central

CONVENTION VOTING AND TABULATION  
ImageCast® Precinct  
ImageCast® Evolution

Optional Solutions

### ABOUT

Dominion Difference

Dominion Secure

Careers

### INFO

Customer Support

1-866-654-VOTE (8663)

Contact Us

U.S.: Denver, CO

CANADA: Toronto, ON

REPORTER'S NOTE:

EXHIBIT 17

Video File

PRESERVED IN NATIVE FORMAT



HOME ABOUT PRODUCTS SUPPORT SECURITY CAREERS



Exhibit  
PLTF 0018  
MALKIN

Go to Statement from Dominion on Sidney Powell Charges

Updated: November 25, 2020

SETTING THE RECORD STRAIGHT: FACTS & RUMORS

## DOMINION VOTING SYSTEMS CATEGORICALLY DENIES FALSE ASSERTIONS ABOUT VOTE SWITCHING AND SOFTWARE ISSUES WITH OUR VOTING SYSTEMS.

According to a joint statement by the federal government agency that oversees U.S. election security, the Department of Homeland Security's cybersecurity & infrastructure security agency (CISA): "There is no evidence that any voting system deleted or lost votes, changed votes, or was in any way compromised." The government & private sector council that support this mission called the 2020 election "the most secure in American history."

### 1) DOMINION IS NOT SHUTTERING ITS OFFICES. EMPLOYEES HAVE BEEN ENCOURAGED TO WORK REMOTELY AND PROTECT THEIR SOCIAL MEDIA PROFILES DUE TO PERSISTENT HARASSMENT AND THREATS AGAINST PERSONAL SAFETY.

Dominion employees are being forced to retreat from their lives due to personal safety concerns, not only for our employees themselves, but also for their extended families.

- ① ABC News has reported on these security concerns, saying that after "two weeks of false fraud claims," this is the latest sign that "freewheeling online rhetoric has real world consequences."
- ② Dominion team members are working around the clock to address issues with law enforcement and take every measure we can to ensure the safety of our employees.
- ③ Dominion will not comment further about our personnel due to these safety concerns.

### 2) VOTE DELETION/SWITCHING ASSERTIONS ARE COMPLETELY FALSE.

An unsubstantiated claim about the deletion of 2.7 million pro-Trump votes that was posted on the Internet and spread on social media has been taken down and debunked by independent fact-checkers.

- ① Edison Research (ER) has refuted any claims that company data suggests any voting irregularities, including vote switching. Edison Research President Larry Rosin told The Dispatch Fact Check, "Edison Research created no such report and we are not aware of any voter fraud."
- ② Claims that 941,000 votes for President Trump in Pennsylvania were deleted are impossible. The fourteen counties using Dominion systems collectively produced 1.3 million votes, representing a voter turnout of 76%. Fifty-two percent of those votes went to President Trump, amounting to 676,000 votes processed for the President in Pennsylvania using company systems.
- ③ The U.S. Department of Homeland Security's cybersecurity division has confirmed that: it is not possible for a bad actor to change election results without detection.
- ④ Dominion doesn't even operate in some of the contested districts, including Philadelphia; Allegheny County, PA; Milwaukee; and Dane County.



### 3) DOMINION'S SYSTEMS ARE SECURE AND ARE CERTIFIED UNDER THE U.S. ELECTION ASSISTANCE COMMISSION (EAC).

All U.S. voting systems must provide assurance that they work accurately and reliably as intended under federal U.S. EAC and state certifications and testing requirements. Dominion's voting systems are certified for the 2020 elections.

- ⊗ Servers that run Dominion software are located in local election offices, and data never leaves the control of local election officials.
- ⊗ Dominion does not have the ability to review votes in real-time as they are submitted.
- ⊗ Dominion software does not have the ability to fractionalize or weight a vote.
- ⊗ Dominion's tabulators do not have exposed USB or other memory ports.
- ⊗ Dominion software tabulates ballots. It does not collect or store voter information.
- ⊗ Dominion is certified in 28 states. While we disagree with Texas' decision to not certify our systems, we understand there are different standards in different states. Sometimes it takes adjustments, for any company's systems, to meet a certain state's standard.

### 4) ASSERTIONS OF "SUPERCOMPUTER" ELECTION FRAUD CONSPIRACIES ARE 100% FALSE.

The Cybersecurity and Infrastructure Security Agency (CISA) has debunked claims about the existence of a secret CIA program for vote fraud called Hammer and Sledgehammer.

- ⊗ All U.S. voting systems must provide assurance that they work accurately and reliably as intended under federal U.S. EAC and state certifications and testing requirements. Election safeguards - from testing and certification of voting systems, to canvassing and auditing - prevent malicious actors from tampering with vote counts and ensure final vote tallies are accurate. Read more from CISA.
- ⊗ There have been no "reds" of Dominion servers by the U.S. military or otherwise, and Dominion does not have servers in Germany. CISA has refuted this claim on Twitter, and the U.S. Army has also confirmed to the Associated Press that it's false.

### 5) THERE WERE NO DOMINION SOFTWARE GLITCHES AND BALLOTS WERE ACCURATELY TABULATED. THE RESULTS ARE 100% AUDITABLE.

No credible reports or evidence of any software issues exist. Vote counts are conducted by county and state election officials, not by Dominion. Our systems support tabulation by those officials alone. Human errors related to reporting tabulated results have arisen in a few counties, including some using Dominion equipment, but appropriate procedural actions have been taken by the county to address these errors were made prior to the canvass process.

- ⊗ The Michigan Secretary of State's office offers a Fact Check Page which debunks false or erroneous claims about voting in Detroit, as well as a user-error incident in Antrim County.
- ⊗ The Georgia Secretary of State has also repeatedly stated throughout the count that "As the work goes on, I want to assure Georgia voters that every legal vote was cast and accurately counted."
- ⊗ Dominion's systems are not responsible for 2,631 uncounted ballots discovered in Floyd County, Georgia during the statewide recount. The Secretary of State's office has cited clerical error and lack of following proper procedures as the cause.
- ⊗ Votes are not processed outside the United States. Votes are counted and reported by county and state election officials - not by Dominion, or any other election technology company. Assertions that votes are counted in Germany are completely false, as has been fact-checked by the Associated Press.

## 6) DOMINION EMPLOYEES DO NOT HAVE ACCESS TO THE BALLOT ADJUDICATION SYSTEM, NOR DO THEY OPERATE IT.

The canvass process exists to allow election officials to validate and count ballots that were unable to be counted on Election Day because they needed additional adjudication. Dominion employees do not have access to this adjudication system, nor do they operate it.

- ② Access to any adjudication system resides with the election authority using it. The system is controlled through secure and verifiable user accounts, and all the voter intent adjustments are securely logged in the system and then recorded in the digital image of the ballot.
- ② All states require bipartisan/multi-person teams in order to adjudicate ballots in accordance with the law.

## 7) DOMINION IS A NONPARTISAN U.S. COMPANY BASED IN DENVER, CO.

Dominion has no company ownership relationships with the Pelosi family, Feinstein family, Clinton Global Initiative, Smartmatic, Scylla, or any ties to Venezuela or Cuba. Dominion works with all U.S. political parties; our customer base and our government outreach practices reflect this nonpartisan approach.

- ② The Associated Press has verified that Dominion has no ties to Venezuela.
- ② As reported by the Associated Press, "Dominion made a one-time philanthropic commitment at a Clinton Global Initiative meeting in 2016, but the Clinton Foundation has no stake or involvement in Dominion's operations, the nonprofit confirmed." The meeting included bipartisan attendees focused on international democracy building.

## 8) DOMINION IS NOT, AND HAS NEVER BEEN, OWNED BY SMARTMATIC.

Dominion is an entirely separate company and a fierce competitor to Smartmatic.

- ② Dominion and Smartmatic do not collaborate in any way and have no affiliate relationships or financial ties.
- ② Dominion does not use Smartmatic software.
- ② The only associations the companies have ever had were:
  - In 2009, Smartmatic licensed Dominion machines for use in the Philippines. The contract ended in a lawsuit.
  - In 2010, Dominion purchased certain assets from Sequoia, a private U.S. company. Smartmatic, a previous owner of Sequoia, pursued legal actions against Dominion.
- ② Dominion did not acquire Smartmatic and/or its software from Sequoia.

## 9) NO UNAUTHORIZED OR LAST-MINUTE SOFTWARE UPDATES OCCURRED.

Claims about software updates being done the night before Election Day are 100% false. Our voting systems are designed and certified by the U.S. government to be closed and do not rely on network connectivity.

- ② Both Spalding County and the Georgia Secretary of State have verified that a) this type of unauthorized update is impossible, and b) the actual logs from equipment under the custody of the County determined an update did NOT happen the night before the election.
- ② Georgia Voting System Implementation Manager Gabe Sterling has affirmed in his daily press briefing on November 9 that "nothing was done to the [Android] system after [October 31]," when voter files were updated as part of normal procedure.



## 10) MISINFORMATION IS AN ATTACK ON OUR DOMINION CUSTOMERS: LOCAL ELECTION OFFICIALS AND SECRETARIES OF STATE.

Eroneous claims that precincts in Michigan had more votes recorded than actual voters point to an affidavit that has several glaring errors. The counties cited are in Minnesota, not Michigan, and the affidavit's claims regarding overvotes are not verified with any data from previous Minnesota elections or the Secretary of State. This claim has no basis in truth.

These dedicated public servants - not Dominion - run our elections and many have reaffirmed the integrity of the elections. Recent statements from election officials include:

### MICHIGAN

- ② The Michigan Secretary of State's office debunked false claims about the election in the state, stating absentee ballot counting was transparent and accurate and that an isolated user error in Antrim County did not affect election results.
- ② A spokesperson for the Michigan Secretary of State stated, "We have not seen any evidence of fraud or foul play in the actual administration of the election. What we have seen is that it was smooth, transparent, secure and accurate."

### GEORGIA

- ② The Georgia Secretary of State stated upon completion of a statewide review of ballots on November 19, "Georgia's historic first statewide audit reaffirmed that the state's new secure paper ballot voting system accurately counted and reported results."


### ARIZONA

- ② The Chairmen of the Maricopa County Board of Supervisors released a letter on November 17 noting, "The evidence overwhelmingly shows the system used in Maricopa County is accurate and provided voters with a reliable election. The Dominion tabulation equipment met mandatory requirements during logic and accuracy testing before the Presidential Preference Election, the Primary Election and the General Election. And after each of these 2020 elections, the hand count audit showed the machines generated an accurate count."

## 11) THERE ARE NO ISSUES WITH THE USE OF SHARPIE PENS.

Election officials provide writing instruments that are approved for marking ballots to all in-person voters using hand-marked paper ballots. Dominion Voting Systems machines can read all of these instruments, including Sharpies.

- ② The DHS Cybersecurity and Infrastructure Security Agency, "If a ballot has issues that impact its ability to be scanned, it can be hand counted." The Maricopa County Board of Supervisors assured voters that "Sharpies do not invalidate ballots." Dominion has stated that "Sharpie pens are safe and reliable to use on ballots, and recommended due to their quick-drying ink."

 <p><b>DOMINION VOTING</b></p> <p>Founded in 2003, Dominion Voting Systems is a leading and fully superior of election technology solutions.</p>	<p><b>PRODUCTS</b></p> <p>MANAGEMENT Desktop and Tablets</p> <p>IN-PERSON AND ACCESSIBLE VOTING ImageCast® X</p> <p>CLOUD-BASED Compliance Center</p> <p>CONSECUTION VOTES AND TABULATION Progressive Printing Intelligent Election</p> <p>Optional Solutions</p>	<p><b>ABOUT</b></p> <p>Dominion Software Dominion Secure Server</p>	<p><b>INFO</b></p> <p>Customer Support 1-866-666-7076 (7663)</p> <p>Contact Us</p> <p>U.S.: OHIO, CO CANADA: TORONTO, ON</p>
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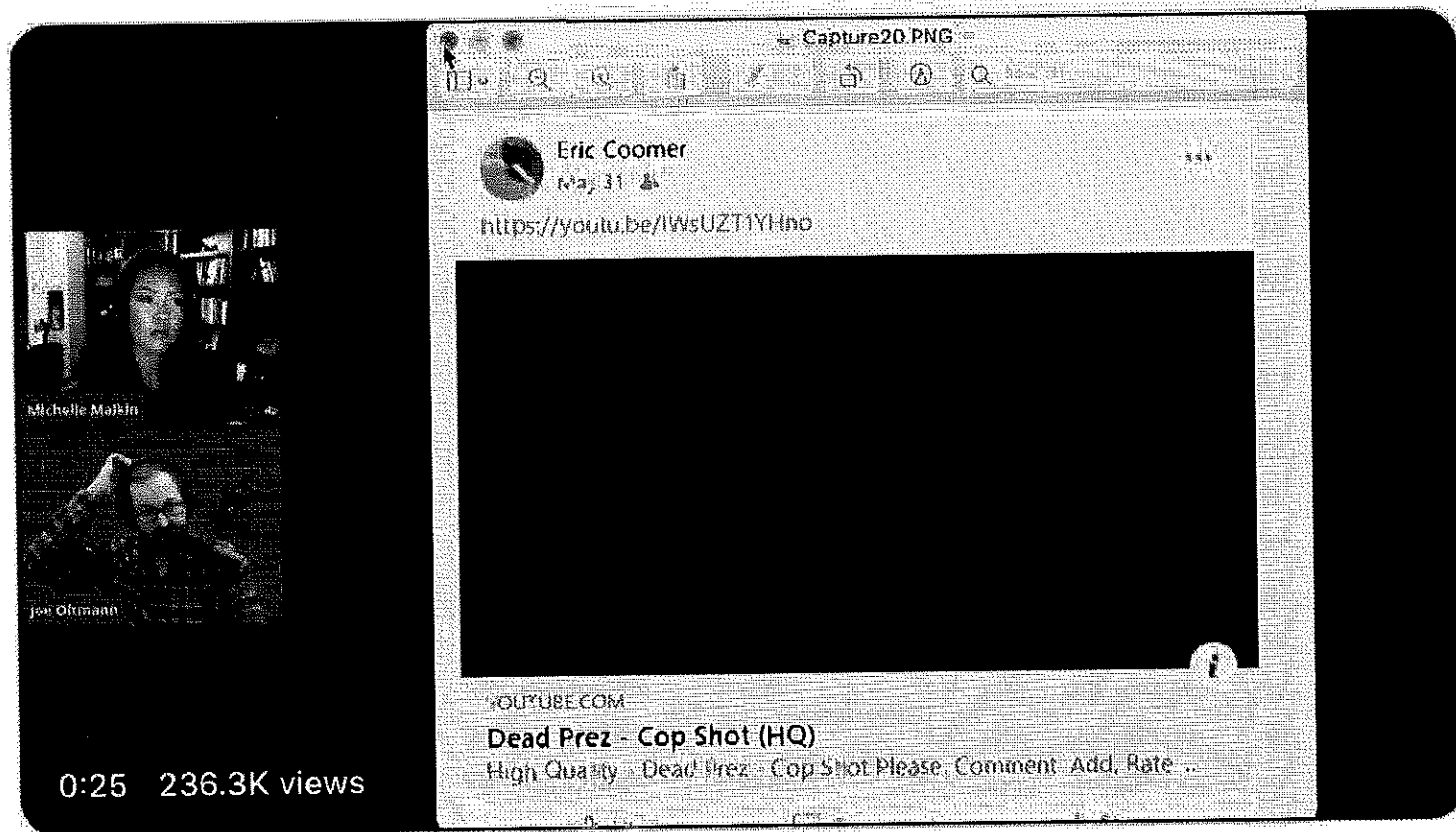
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**Michelle Malkin** ✓  
@michellemalkin

000

Joe Oltmann (now banned on Twitter) exposes pro-Antifa, cop hatred-inciting rants of #EricCoomer, VP of strategy/security of Dominion Voting Systems. "What if I told you he is a major shareholder" in Dominion & "owns patents associated with other voting systems?"  
#MalkinLive



12:43 PM · Nov 13, 2020 · Twitter Media Studio - LiveCut

**5.6K** Retweets **737** Quote Tweets **8.1K** Likes

**Exhibit**  
**PLTF 0019**  
**MALKIN**



**Michelle Malkin** ✓  
@michellemalkin



Replying to @michellemalkin

Full interview with #joeoltmann on #ericcoomer  
#dominion here ==>



#MalkinLive: Election update  
[youtube.com](#)

12:46 PM · Nov 13, 2020 · Twitter Web App

702 Retweets 101 Quote Tweets 1.1K Likes

Exhibit  
PLTF 0020  
MALKIN



**Michelle Malkin**   
@michellemalkin

...

Replying to @michellemalkin

**What are they trying to hide? #DominionVotingSystems**

**twitter.com/JoeyCamp2020/s...**

This Tweet is unavailable.

2:31 PM · Nov 13, 2020 · Twitter Web App

**597** Retweets   **28** Quote Tweets   **1K** Likes

**Exhibit**  
**PLTF 0021**  
MALKIN





**Michelle Malkin**   
@michellemalkin

...

ICYMI - Dominion, Antifa & #EricComer exposed by Joe Oltmann on #MalkinLive last week. Joe was suspended by Twitter but you can find him on @parler

**Michelle Malkin** @michellemalkin · Nov 13

Joe Oltmann (now banned on Twitter) exposes pro-Antifa, cop hatred-inciting rants of #EricComer, VP of strategy/security of Dominion Voting Systems. "What if I told you he is a major shareholder" in Dominion & "owns patents associated with other voting systems?" #MalkinLive

Show this thread



12:09 PM · Nov 15, 2020 · Twitter for iPhone

1.7K Retweets 130 Quote Tweets 3K Likes

Exhibit  
PLTF 0022  
MALKIN

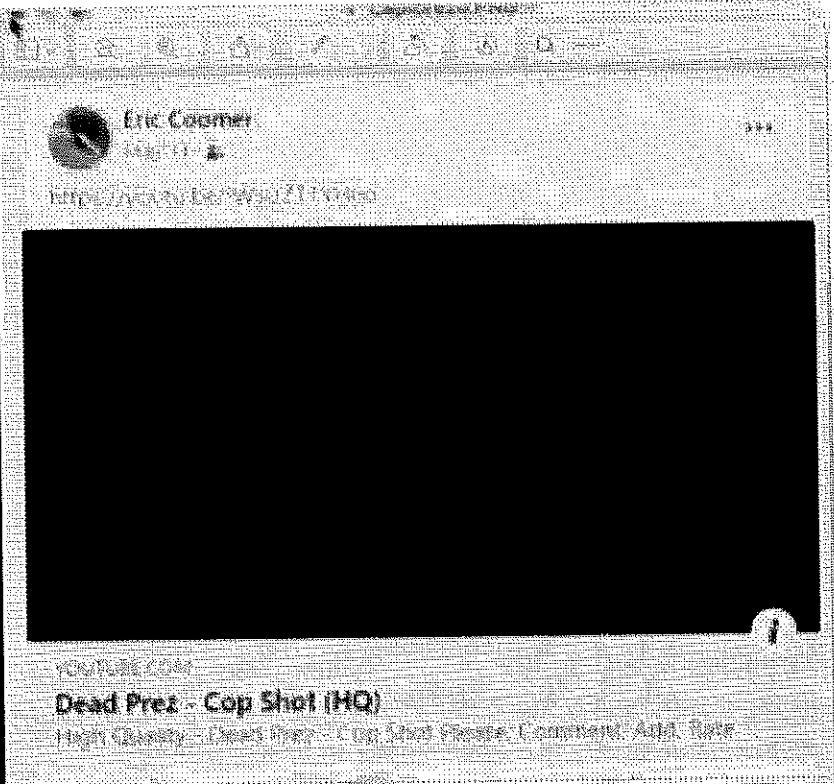


**Michelle Malkin** ✓  
@michellemalkin

...

ICYMI: #ExposeDominion #WholsEricCoomer  
#JoeOltmann

Denver Business Owner: Dominion's Eric Coomer Is an  
Unhinged Sociopath -- His Internet Profile Is Being  
Deleted and Erased (AUDIO)



Denver Business Owner: Dominion's Eric Coomer Is an Unhinged Sociopath --...  
In 2010 Eric Coomer joined Dominion as Vice President of U.S. Engineering.  
According to his bio, Coomer graduated from the University of California, ...  
thegatewaypundit.com

12:29 PM · Nov 16, 2020 · Twitter Web App

**Exhibit**  
**PLTF 0023**  
**MALKIN**



572 Retweets 62 Quote Tweets 931 Likes



**Michelle Malkin**   
@michellemalkin

...

In case you missed it: My interview with #JoeOltmann from six days ago exposing #EricCoomer #Antifa #ExposeDominion ==>

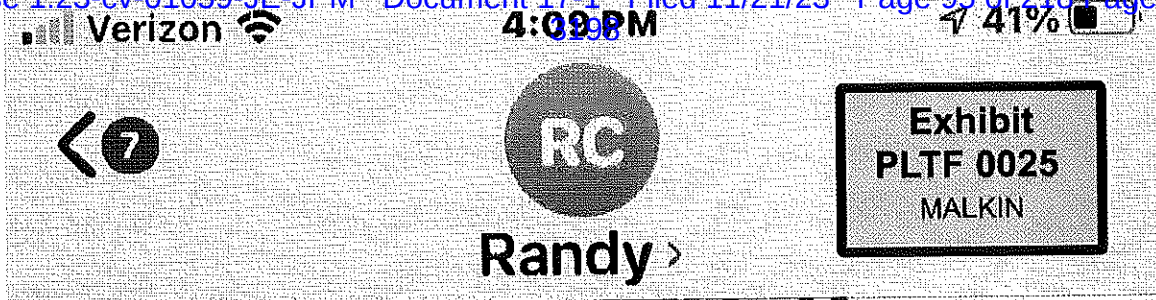
 **Michelle Malkin**  @michellemalkin · Nov 13  
#MalkinLive: Election update pscp.tv/w/cn1j\_zE1MzEw...  
Show this thread

12:19 PM · Nov 19, 2020 · Twitter Web App

**287** Retweets **21** Quote Tweets **604** Likes

**Exhibit**  
**PLTF 0024**  
**MALKIN**



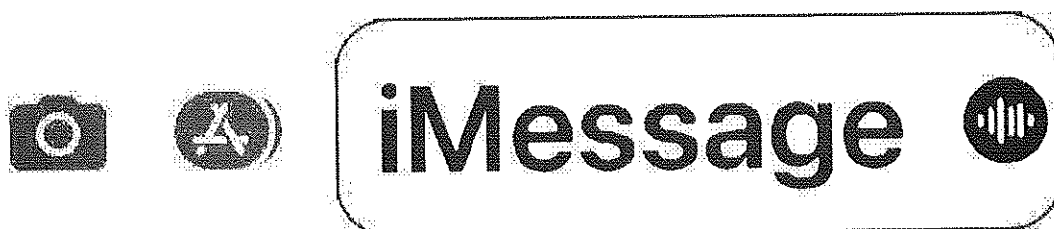


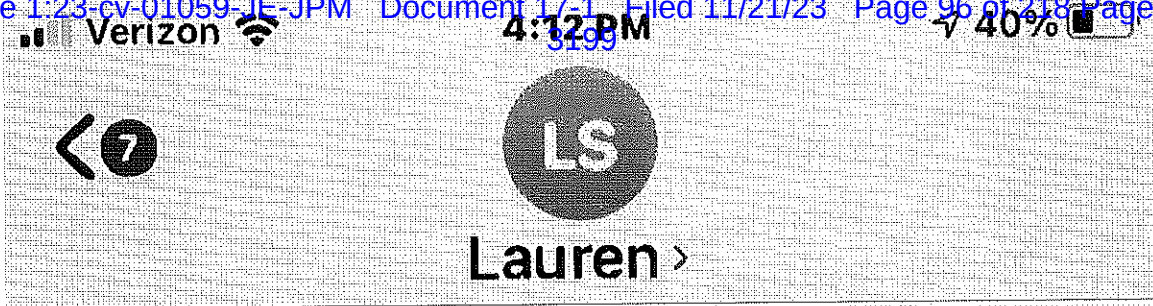
is essential. So  
glad to know  
you.

Thu, Nov 12, 12:57 PM

Joe Oltmann JO >

Wed, Nov 25, 9:54 PM





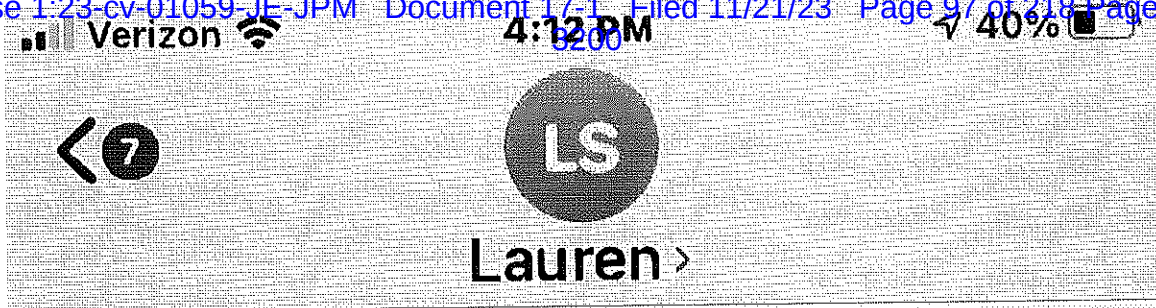
**Hey Michelle  
it's Lauren  
(previously  
from Hannity  
radio). I am  
working with  
Sidney Powell  
and Don  
Brown (Clint**



**iMessage**







**Lorance's  
atty)\_**

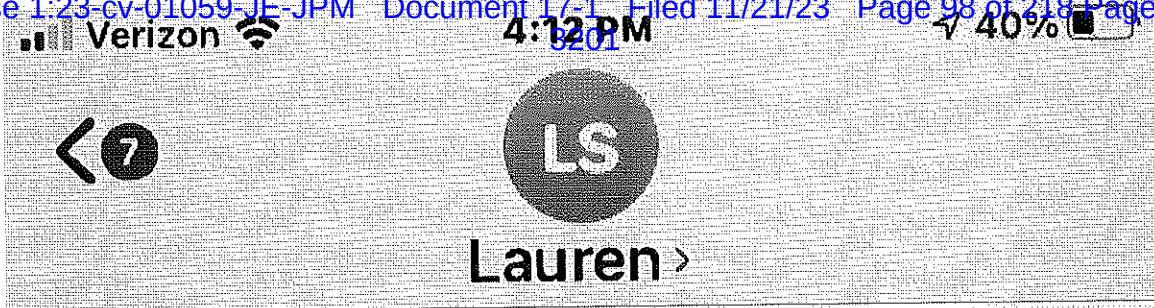
**We saw your  
interview with  
Joe Oltmann-  
absolutely in-  
credible.  
They'd like to  
get a signed**



**iMessage**





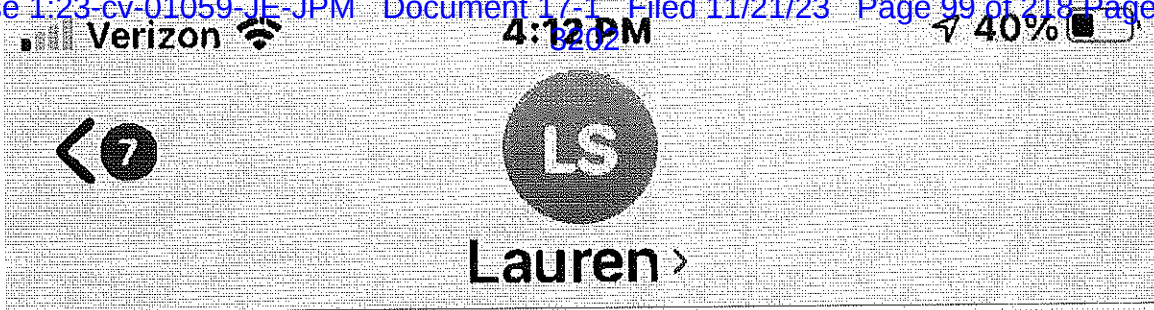


**They'd like to  
get a signed  
affidavit from  
Joe about  
Coomer and  
use his info in  
their federal  
complaint. Is  
there any way**



**iMessage**





**Coomer and  
use his info in  
their federal  
complaint. Is  
there any way  
you can put us  
in touch?**

**Sun, Nov 15, 7:49 AM**



**iMessage**

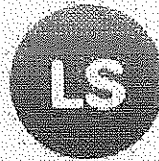




Verizon

4:18 PM

40%



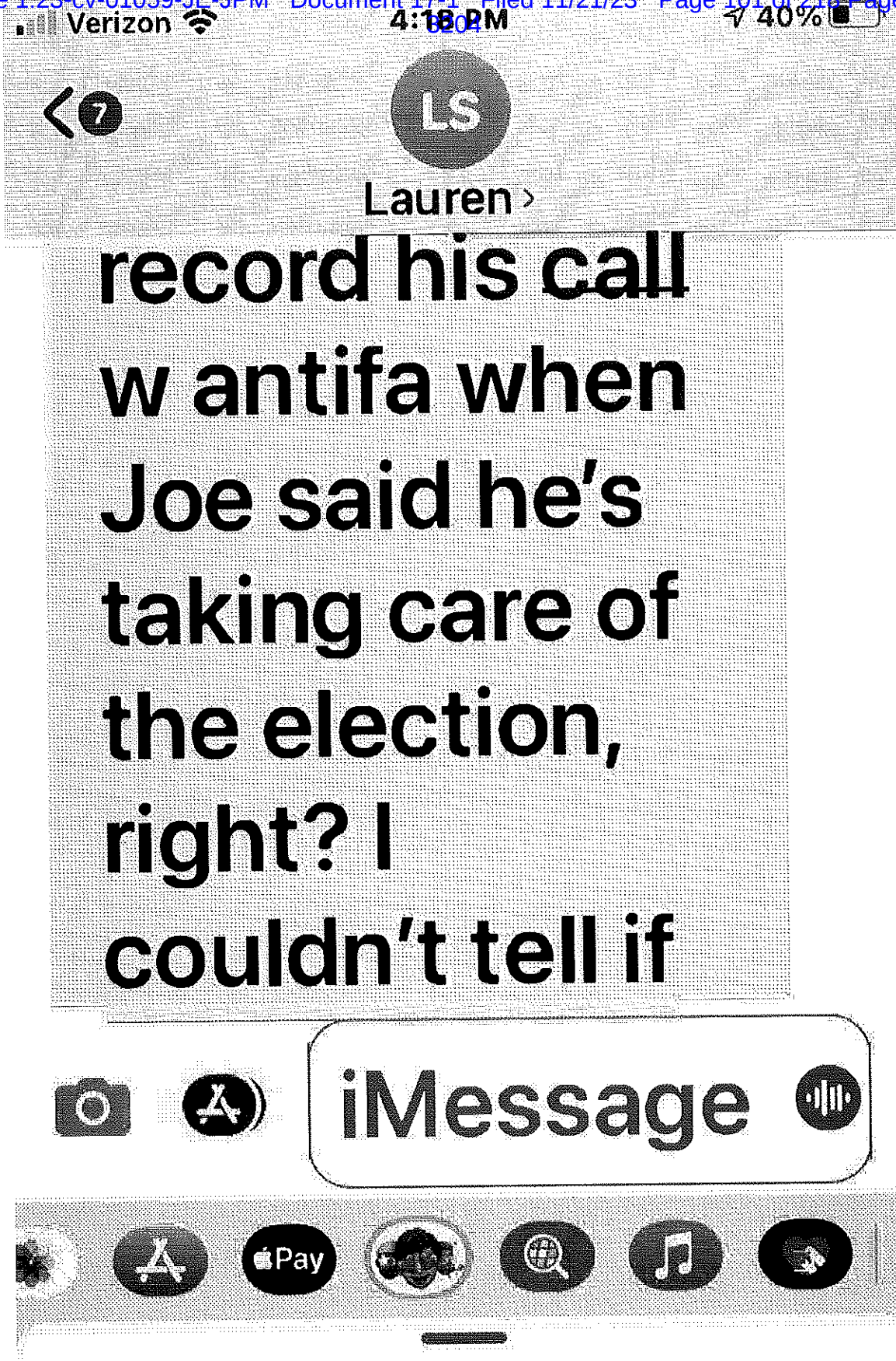
Lauren &gt;

nect you with  
Joe ASAP and  
I'll email you  
one of his zip  
files - he has  
tons of  
screenshots  
and docu-  
ments - stand



iMessage



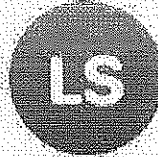




Verizon

4:19 PM

39%



Lauren >

Ugh- perfect!  
Let's do this.

Thank you so  
much

lauren.m-  
claughlin117@  
gmail.com



iMessage





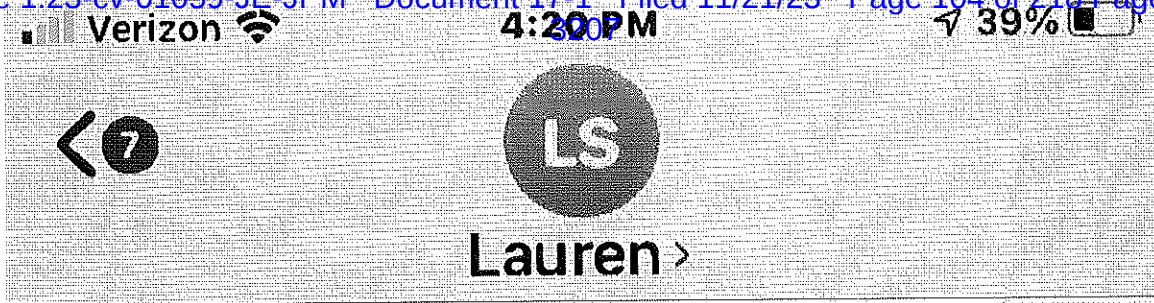
Oh, I'm assum-  
ing Joe didn't  
record his call  
w antifa when  
Joe said he's  
taking care of  
the election,  
right? I  
couldn't tell if



iMessage







couldn't tell if  
it was a online  
chat or a  
phone call...

He might have  
it - it was tak-  
ing forever that  
morning to  
send me all his



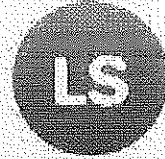
iMessage



Verizon

4:20 PM

39%



Lauren >

morning to  
send me all his  
files so we just  
jumped in with  
discussing the  
one zip

That would be  
incredible

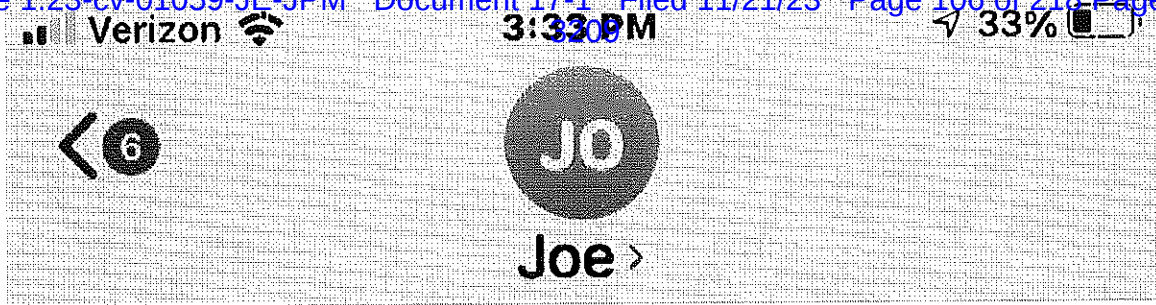
On a side note



iMessage







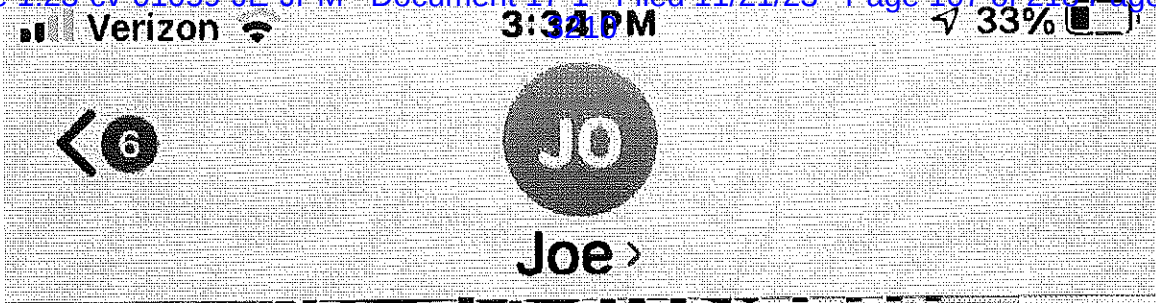
iMessage  
Thu, Nov 12, 1:55 PM

Hi Michelle,  
this is Joe Olt-  
mann. Hoping  
to connect  
with you at  
some point. I'm  
not usually the



iMessage





**not usually the  
public person  
but the calls  
and emails are  
pouring in**

**Thu, Nov 12, 4:40 PM**

**Hi Joe!!! Great**



**iMessage**

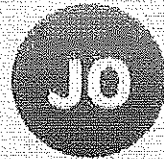




Verizon

3:34 PM

33%



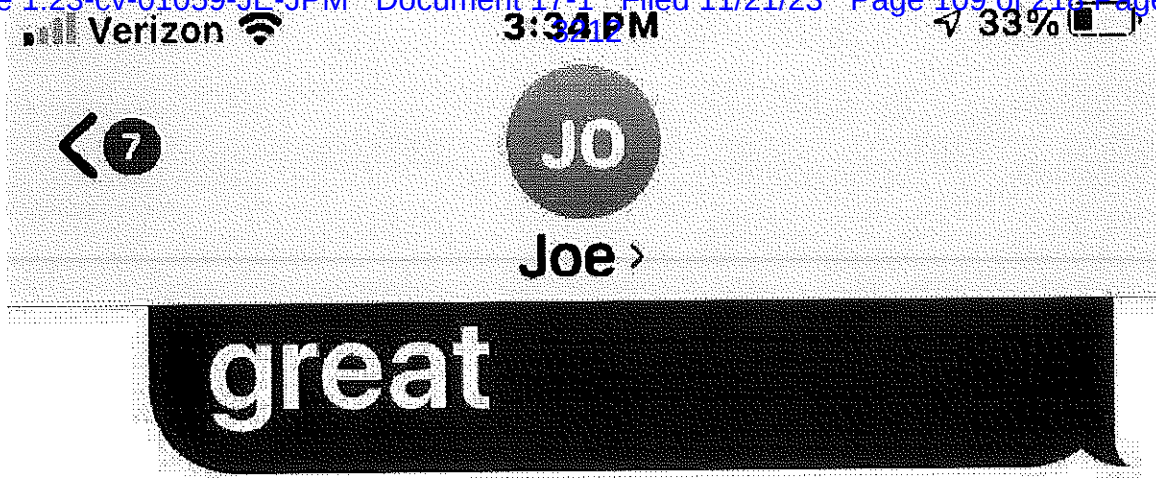
Joe >

work you are  
doing - let's  
touch base to-  
morrow - if you  
are up for do-  
ing a  
livestream in  
the afternoon  
that would be



iMessage





**Fri, Nov 13, 4:43 AM**

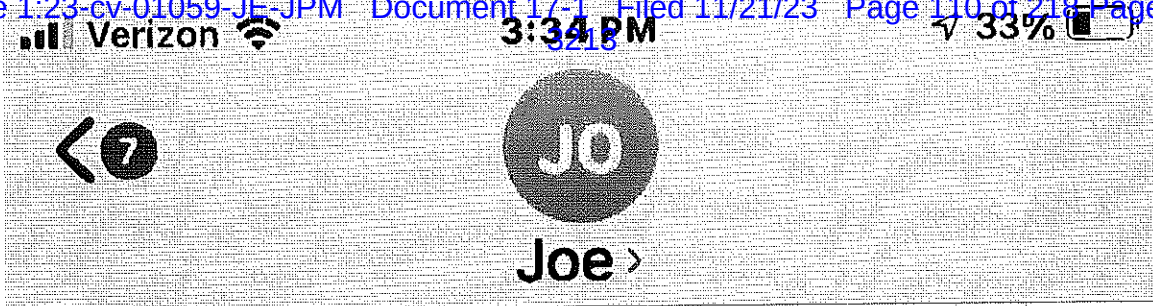
**Just missed  
this. Crazy  
night. Twitter  
suspended my  
account for  
telling the**



**iMessage**





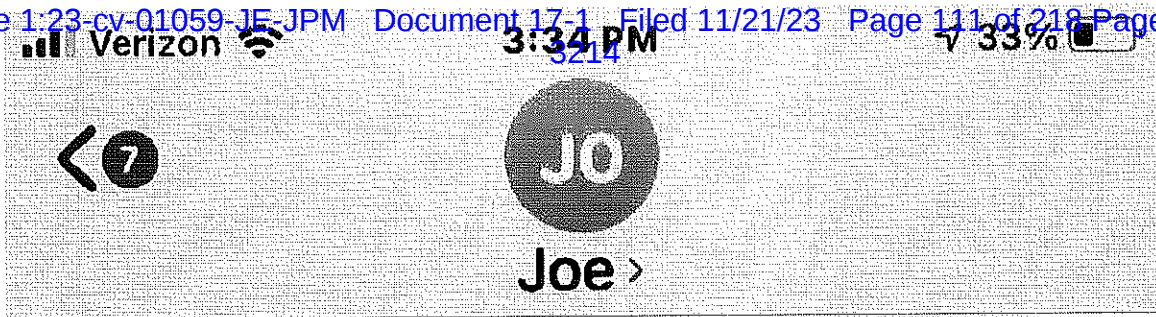


account for  
telling the  
truth, I filed an  
affidavit with  
the trump ad-  
ministration  
and the death  
threats rolled  
in. Been a fun  
day



iMessage





day...

I can do a  
livestream.

Fri, Nov 13, 6:21 AM

Very crazy -  
thanks for  
standing up -



iMessage

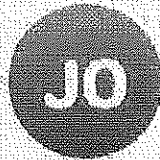




Verizon

3:34 PM

33%



Joe >

can u do a  
stream at  
10am today

Yes I can

Ok great I use  
a platform  
called stream-  
yard - very



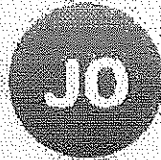
iMessage



Verizon

3:34 PM

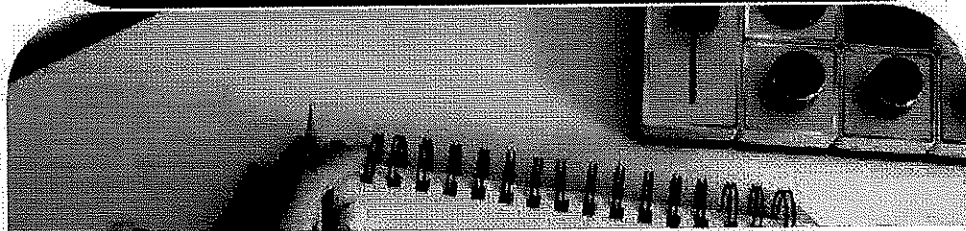
33%



Joe >

seamless - I'll  
send you the  
live link 15  
minutes before  
start time

Here's a guest  
FAQ



iMessage

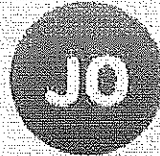




Verizon

3:35 PM

33%



Joe >

**Guest instructions**  
[streamyard.com](https://streamyard.com)

**See you then**

**There is a  
share screen  
function so if  
you have doc-  
uments or**



**iMessage**

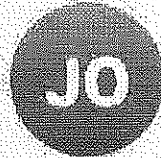




Verizon

3:35 PM

33%



Joe >

graphics you  
want me to put  
on screen I can  
do that

Sounds great. I  
have lots

Great You can  
email anything



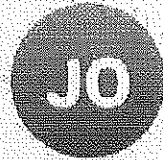
iMessage



Verizon

3:35 PM

33%



Joe >

you want me to  
line up at  
writemalkin at  
gmail dot com

I am headed to  
the office now

Great - here is  
the live link



iMessage

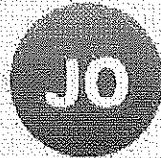




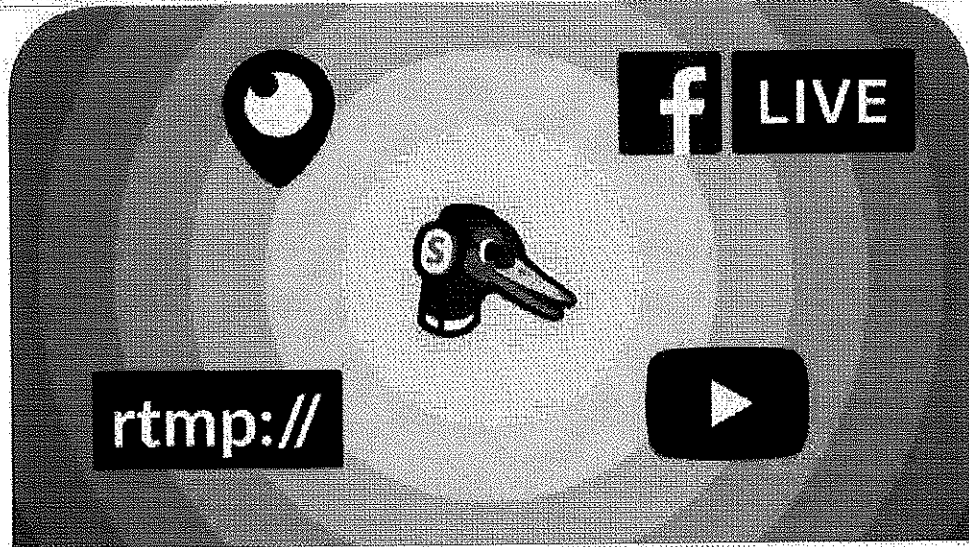
Verizon

3:35 PM

33%



Joe >



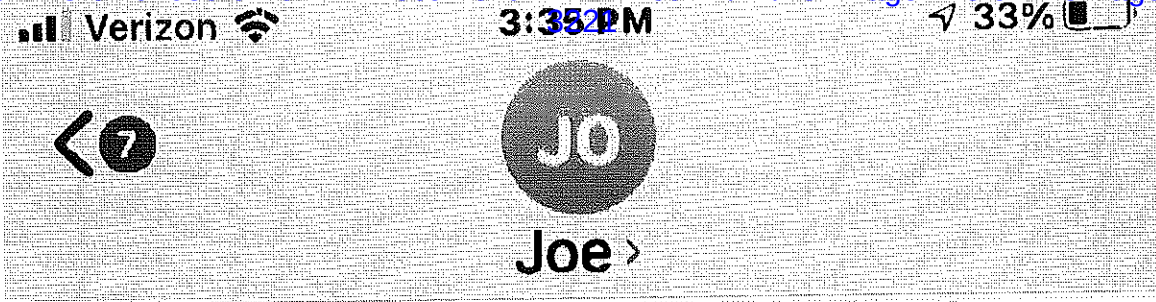
**StreamYard |**  
**Browser-based**  
**live studio for**  
**professionals**  
[streamyard.com](https://streamyard.com)

Just sent you a



iMessage





**Just sent you a  
large file.**

**cut up with  
pics.**

**Ok didn't get it  
yet**

**am standing**



**iMessage**

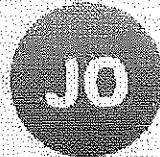




Verizon

3:32 PM

33%



Joe >

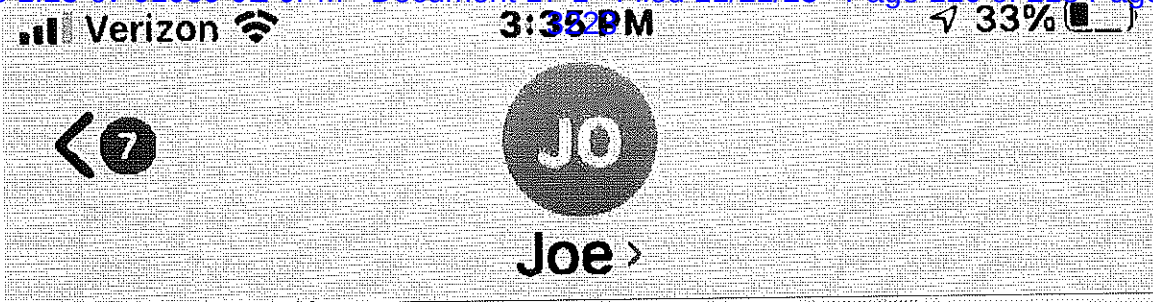
by on stream  
yard - let me  
know if you  
have any prob-  
lems

stand by. cut-  
ting it up for  
you



iMessage





**Sat, Nov 14, 10:07 AM**

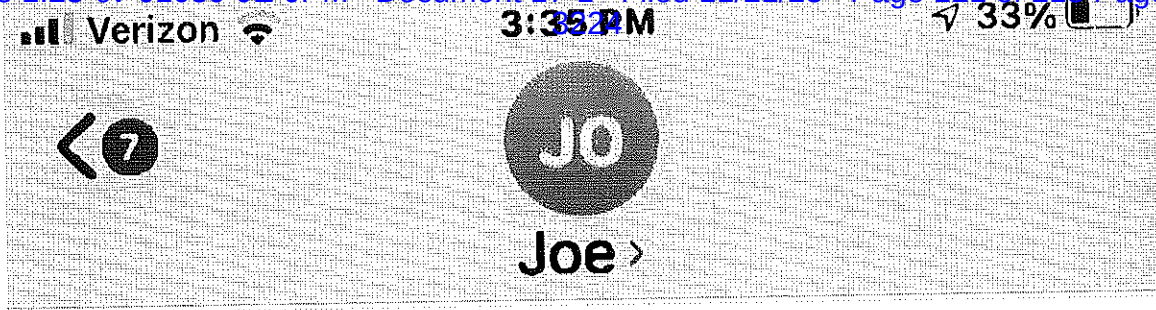
**Thank you  
again for the  
time yesterday.  
Appreciate all  
that you do.**



**iMessage**







**Sun, Nov 15, 5:52 AM**

**Thank u Joe! I  
just got a mes-  
sage from Sid-  
ney Powell's  
aide - they  
want to get an  
affidavit from  
you. Stand by**



**iMessage**



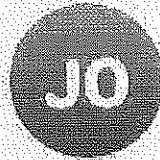
**Apple Pay**



Verizon

3:36 PM

33%



Joe >

you!! Stand by  
- I'm going to  
connect you  
by text now

Lauren is Sean  
Hannity's for-  
mer senior  
producer and a  
rockstar - she



iMessage



Apple Pay

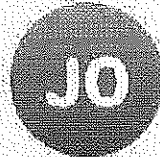




Verizon

3:36 PM

33%



Joe >

rockstar - she  
and Sidney are  
patriots

You are a patri-  
ot!

Been a crazy  
weekend



iMessage



Apple Pay



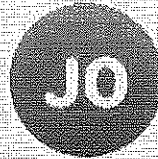
GiF



Verizon

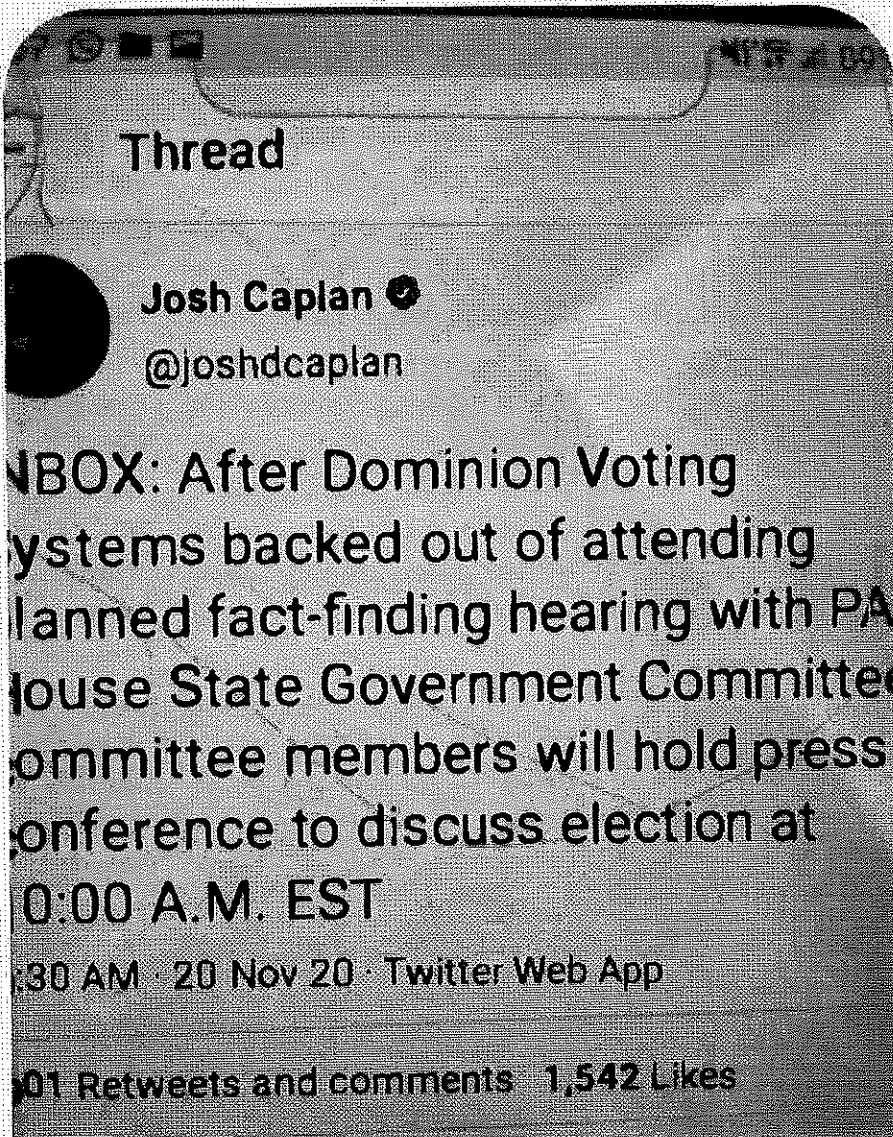
3:32 PM

33%



Joe >

Fri, Nov 20, 6:39 AM



iMessage

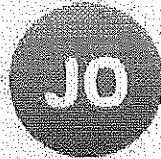




Verizon

3:32 PM

33%



Joe >

Mainstream  
media still ig-  
noring it

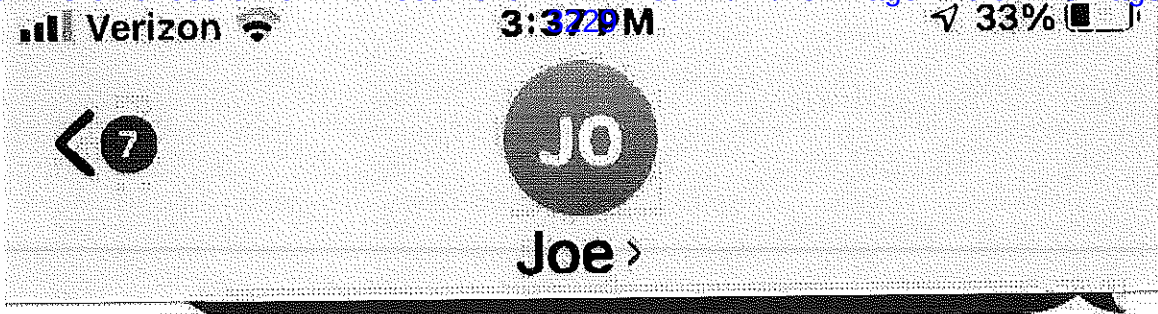
Dawn Keefer  
was amazing -  
do you know  
her

No



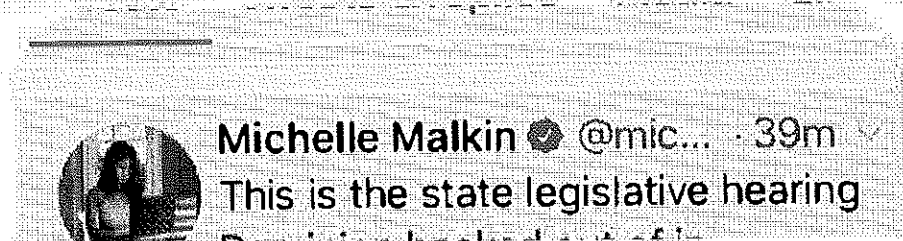
iMessage





No

Can you talk  
now - sorry the  
day got away  
from me yes-  
terday



iMessage

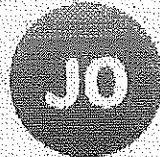




Verizon

3:37 PM

33%



Joe &gt;



Michelle Malkin @mic... · 39m ✓

This is the state legislative hearing Dominion backed out of in Pennsylvania this morning. Supposedly a press conference by GOP legislators is about to happen.



Friday, November 20, 20

10:00 AM

**STATE GOVERNMENT**

Add to Calendar Outlook (iCal) or Google  
Informational meeting with Dominion  
any other business that may come  
committee. Dominion Systems will  
virtually.

33

546

1,367



Show this thread



Michelle Malkin @mich... · 13m ✓

5/ Yes. Keep the heat on,  
@PAHouseGOP. Dawn Keefer was  
total fire at the press conference



PA House Republ... · 31m

Rep. Dawn Keefer, 14 counties



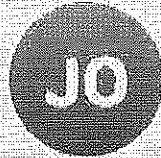
iMessage



Verizon

3:37 PM

33%



Joe &gt;

PA House Republ... · 31m

Rep. Dawn Keefer: 14 counties used the Dominion Voting Systems software. We trust the workers in our polling places and in our counties. But what...



Michelle Malkin @mich... · 12m

6/ No blind trust. Not now. Not ever.

PA House Republ... · 29m

Rep. Dawn Keefer:  
Transparency is key for our election security. Dominion Voting Software is asking us to give them only blind trust. We...



PA House Republ... · 29m

Rep. Dawn Keefer:  
Transparency is key for our



iMessage

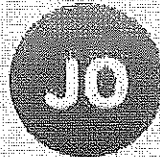




Verizon

3:37 PM

33%



Joe &gt;

 PA House Republ... · 29m

Rep. Dawn Keefer:

Transparency is key for our election security. Dominion Voting Software is asking us to give them only blind trust. We...



48

234

 You Retweeted**Valerie Gaydos** @valgaydos · 5h

UPDATE: At 10 pm last night we were informed that Dominion Voter Systems backed out of testifying before the House State Govt Comm. There will be a House press conf at 10 am TODAY to address Dominion's failure to appear.

156

2,915

7,681



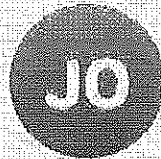
iMessage



Apple Pay



GIF



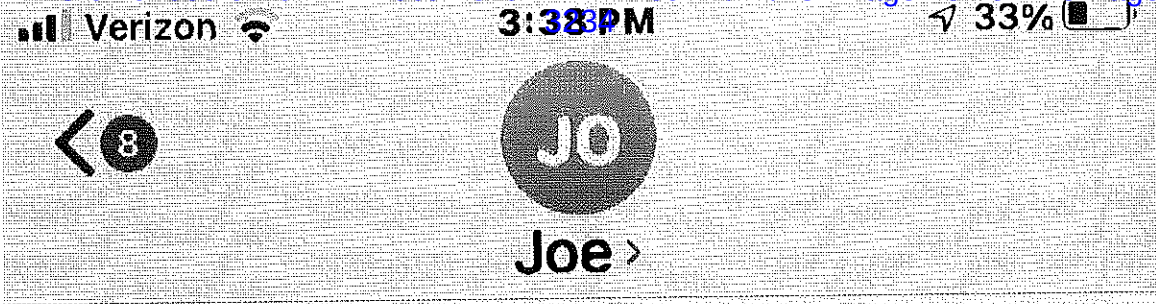
Joe &gt;

**GOP State Rep.  
Dawn Keefer on  
Dominion: "How  
tightly controlled is  
the source code  
and who has  
control over the  
source code?"**

**[https://t.co/  
0AjO86Aab1](https://t.co/0AjO86Aab1)**

**iMessage**



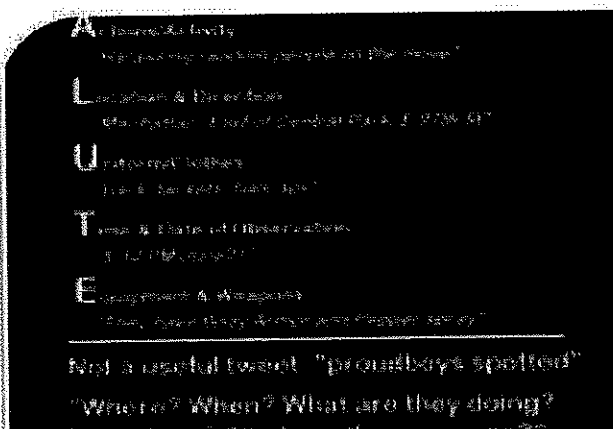


**#ExposeDominion**



**Michelle Malkin**  
twitter.com

**They are  
frauds**



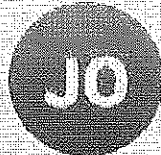
**iMessage**



Verizon

3:38 PM

32%



Joe &gt;

Location & Direction  
 Manhattan East of Campus Clark, 1 W 50 St  
 Information  
 Time & Date of Mass Gathering  
 Equipment & Weapons

Not a useful tweet "proudboys spotted"  
 "Where? When? What are they doing?  
 How Many? What are they carrying?"  
 Use your Judgement!

**POSTING GUIDELINES:**

This channel exclusively  
 disseminates information relevant  
 to our people OTG at events.

#ground - Info from folks OTG  
 #lip - Info from those not  
 participating in the protest, but have  
 eyes on useful intel  
 #twitter - Info found on twitter  
 #fb - Info found on facebook  
 #livestream - Info seen on livestream  
 #radar - Info from flight radar

If you want an example of well run  
 scanner check out Seattle's scanner:  
<https://www.seattlemetroscanner.com/>  
 Ground crew dozen flags  
 congregating at the Capitol. Lots of flags

57 1:42 PM

Denver Metro Scanner



iMessage

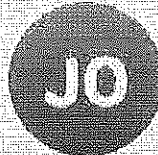




Verizon

3:38 PM

32%



Joe &gt;

Denver Metro Scanner

#twitter Posted at 1:49PM: 'Riot cops coming in from 14th and Sherman.' No word on numbers as of right now.

1:50 PM

Denver Metro Scanner

#livestream 7 officers standing next to a tree about 100ft from the Capitol. Standing next to the tree where the guard rail begins on the S walkway that leads to the corner of Lincoln and W 14th. Shown about 10 mins ago.

1:52 PM

Denver Metro Scanner

#twitter cops are blocking 14th and Bannock.

1:54 PM

November 19

Denver Metro Scanner

#tip 2:53 AM

Denver Metro Scanner

Forwarded message  
From Jackie O



Denver Metro Scanner

Sat

#twitter cops are blocking 14th and Bann...



iMessage



Done

7 of 11



Pinned Message

POSTING GUIDELINES:

DENVER METRO SCANNER

#ground Few dozen maga folks congregating at the Capitol. Lots of flags

57 1:42 PM

Denver Metro Scanner

#twitter Posted at 1:49PM: 'Riot cops coming in from 14th and Sherman.' No word on numbers as of right now.

58 2:05 PM

Denver Metro Scanner

#livestream 7 officers standing next to a tree about 100ft from the Capitol. Standing next to the tree where the guard rail begins on the S walkway that leads to the corner of Lincoln and W 14th. Shown about 10 mins ago.

58 2:12 PM

Denver Metro Scanner

#twitter cops are blocking 14th and Bannock.

54 4:19 PM

November 19

Denver Metro Scanner

#tip

2 2:31 AM

Denver Metro Scanner

Forwarded message  
From Jackie O

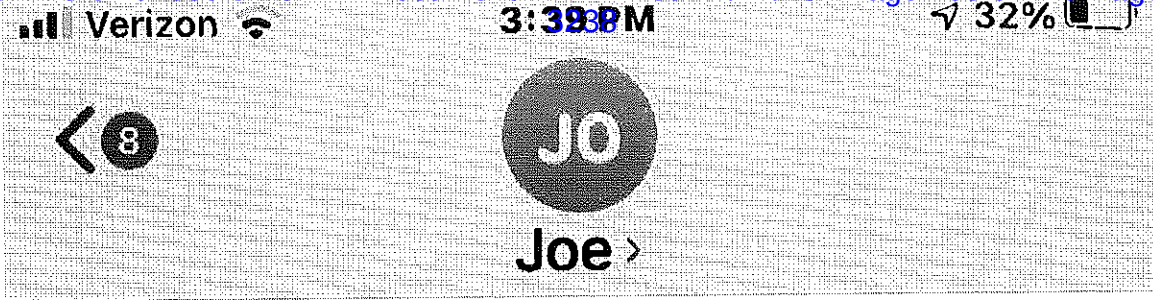
Is Eric from Dominion here? I think he might be in trouble and maybe needs help.

3 2:31 AM

MUTE







**Tue, Nov 24, 6:08 AM**

**Can you come  
on my News-  
max show to  
talk about  
Coomer and  
Dominion - we  
pretape to-  
morrow at**



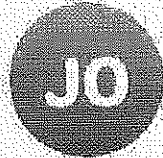
**iMessage**



Verizon

3:39 PM

32%



Joe &gt;

pretape to-  
morrow at  
1230pm  
mountain time  
- it would be  
one segment  
that will run  
around 7 min-  
utes



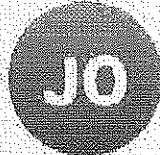
iMessage



Verizon

3:39 PM

32%



Joe >

For you abso-  
lutely

I'm in South  
Dakota

So on my com-  
puter ok?

Thank you!



iMessage

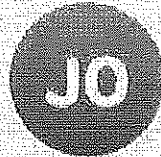




Verizon

3:39 PM

32%



Joe &gt;

Yes it will be by  
Skype (send  
me your Skype  
account name)  
- my Newsmax  
producer will  
be in touch  
soon to nail  
down logistics.



iMessage

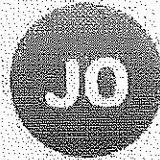




Verizon

3:39 PM

32%



Joe >

Let me know if  
you have any  
new graphics  
or documents  
you want me to  
feature - keep  
up the fight!

Sounds great



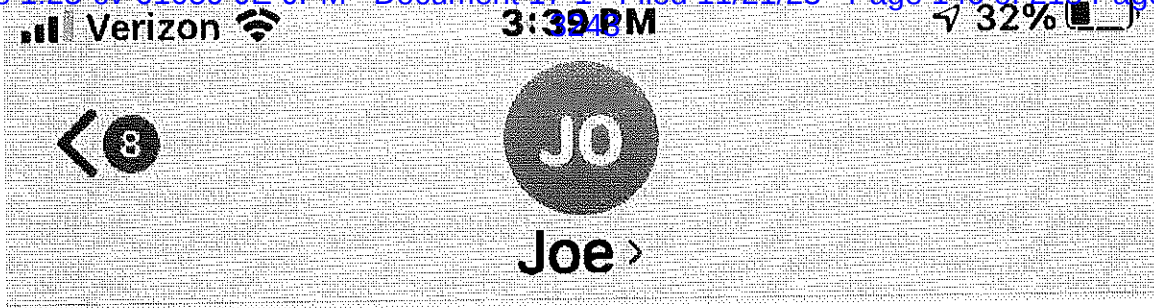
iMessage



Apple Pay



GiF



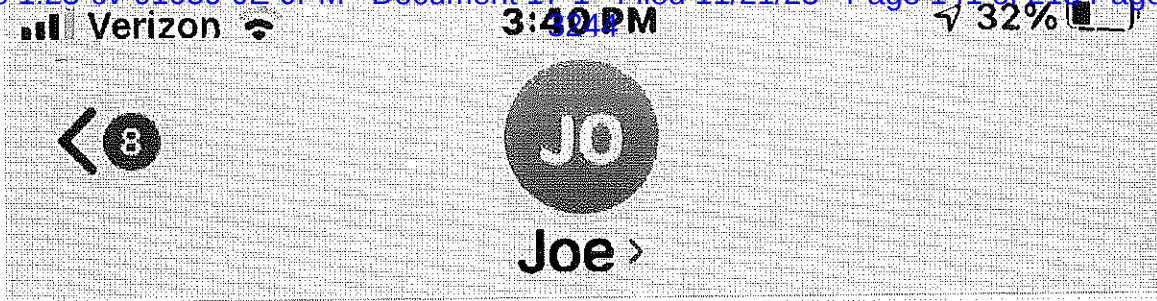
**Tue, Nov 24, 12:20 PM**

**I'm back. I have  
lots of info in-  
cluding the  
Mongolia con-  
nection**

**Tue, Nov 24, 6:23 PM**







**Wed, Nov 25, 6:43 AM**

**Let me know if  
there are spe-  
cific questions  
you want me to  
ask you**

**A 7 minute  
segment gives**



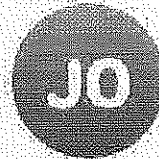
**iMessage**



Verizon

3:41 PM

32%



Joe >

us time for  
about 3 topic  
areas

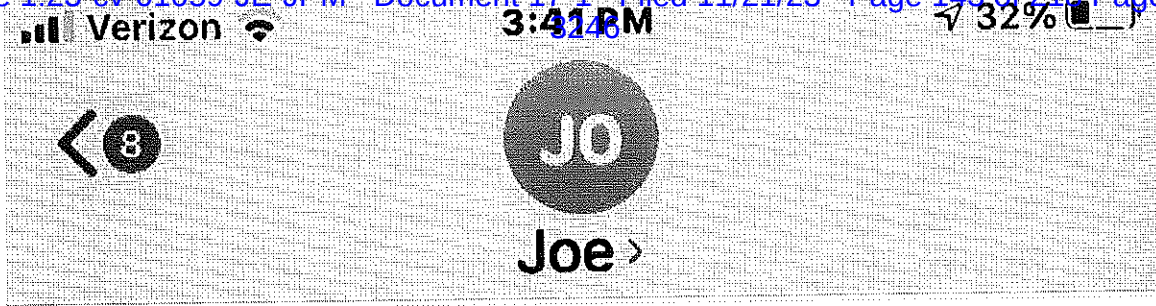
Are you al-  
lowed to talk  
about your  
conversations  
with the trump  
lawyers



iMessage







**Wed, Nov 25, 10:55 AM**

**That was  
amazing - wish  
we had more  
time but I  
know this seg-  
ment will have  
huge impact -**



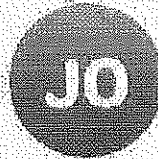
**iMessage**



Verizon

3:41 PM

32%



Joe >

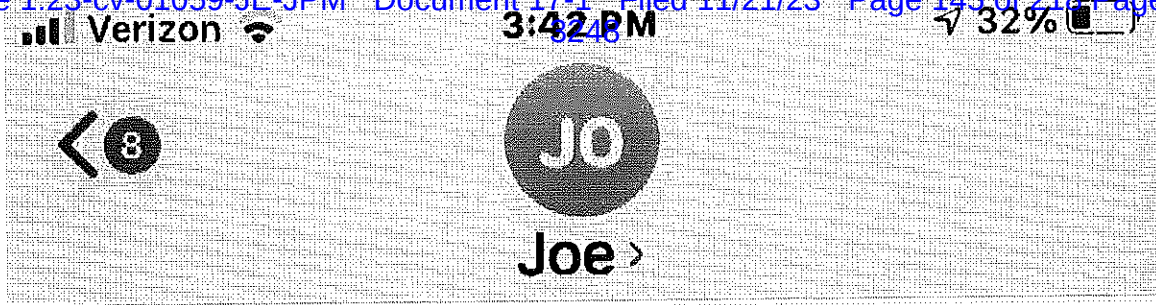
have a blessed  
and safe  
Thanksgiving !  
!! Show airs  
Saturday at  
5pm mountain  
and Sunday  
9am mountain

Happy



iMessage

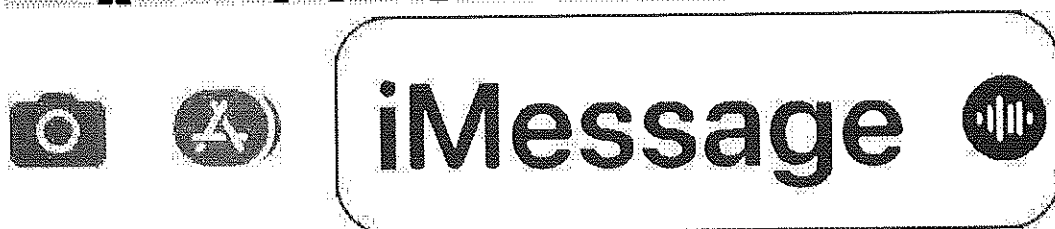




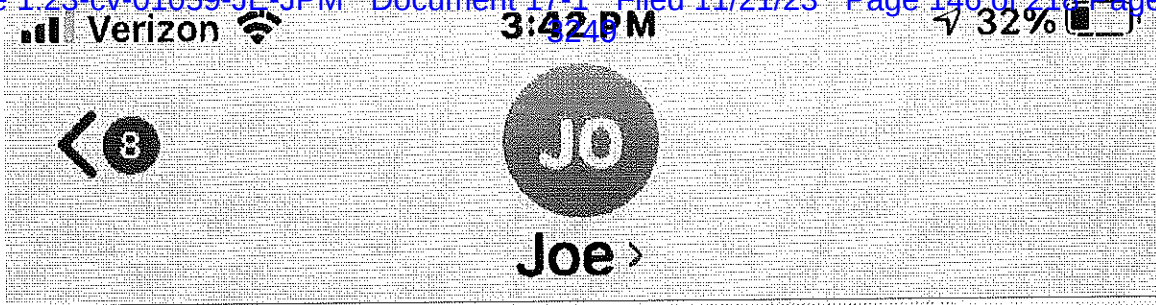
**Wed, Dec 2, 6:20 PM**

**I am so angry  
at ken buck**

**He had a  
meeting  
tonight and  
lied**







**And let domin-  
ion have an  
audience**

**I am so angry**

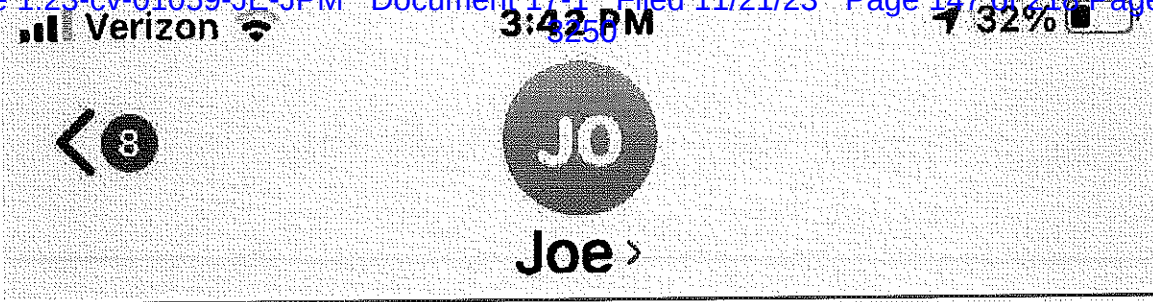
**What!!!!!!  
Where and  
how? Is he  
bought off??**



**iMessage**







**This swamp is  
so deep  
Michelle**

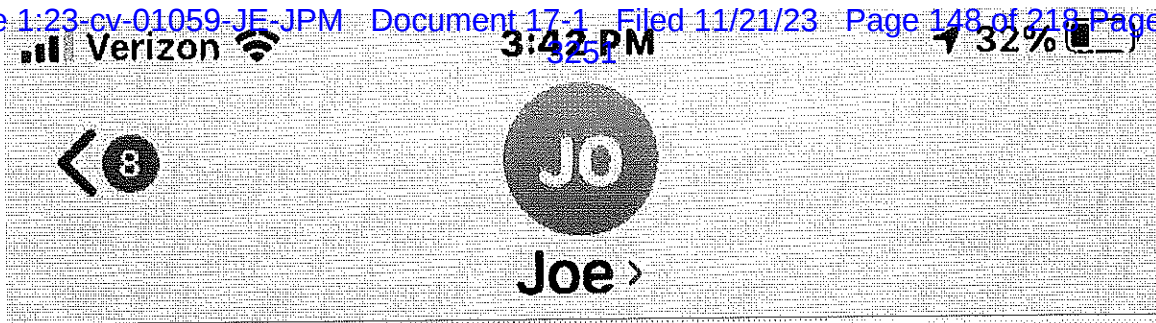
**I know ugh**

**I cannot tell  
you how angry  
I am**



**iMessage**





**I have never  
been this an-  
gry**

**Flat evil**

**But I found Eric  
Coomer**

**So f\$&@ ken**

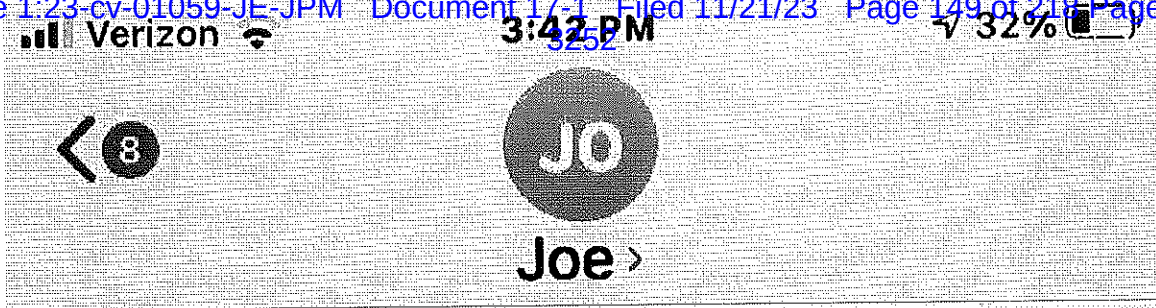
**and the rest of**



**iMessage**







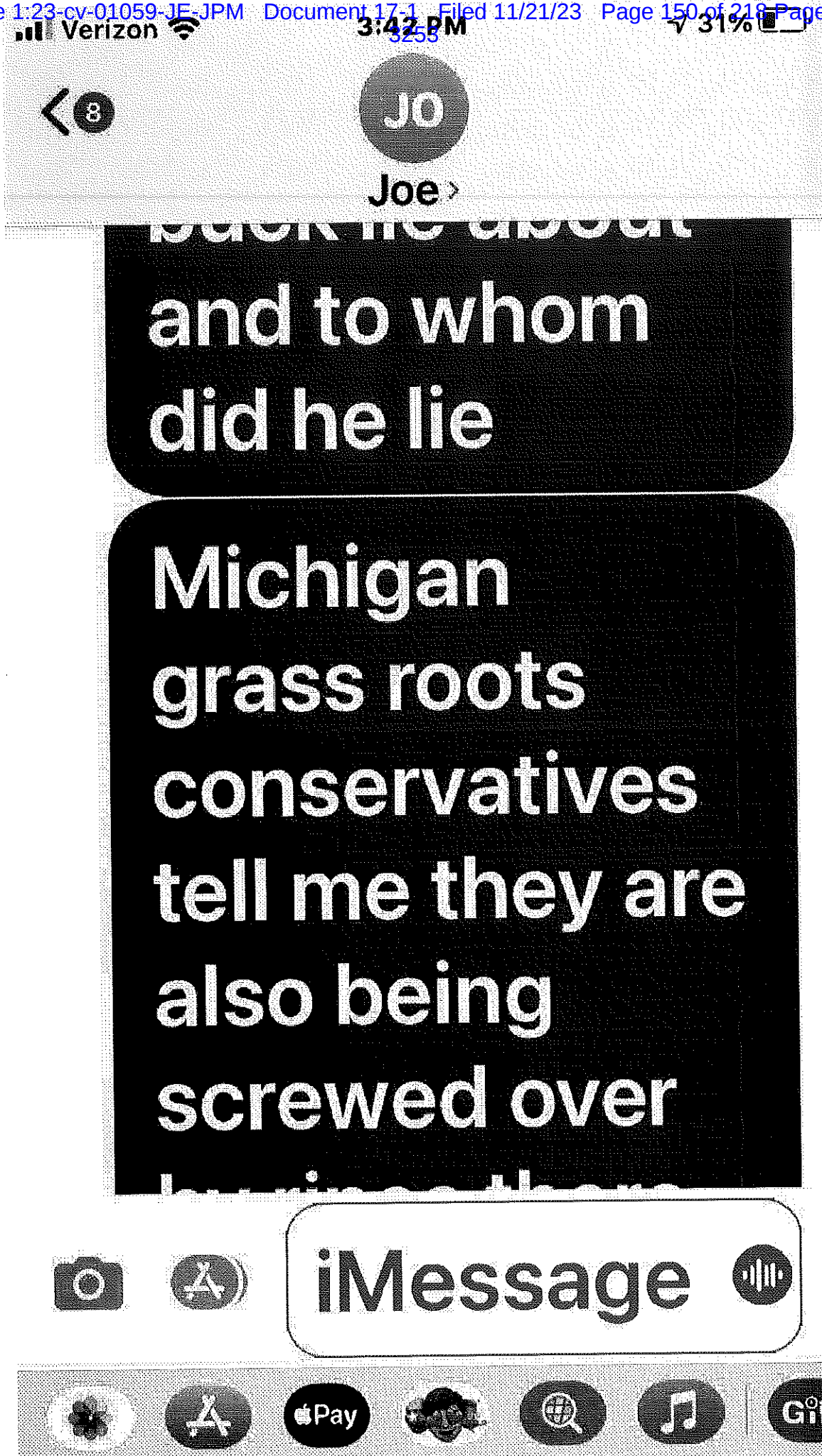
So f\$&@ ken  
and the rest of  
the Rino's

Do you want to  
do another  
livestream on  
it? What did  
buck lie about  
and to whom



iMessage



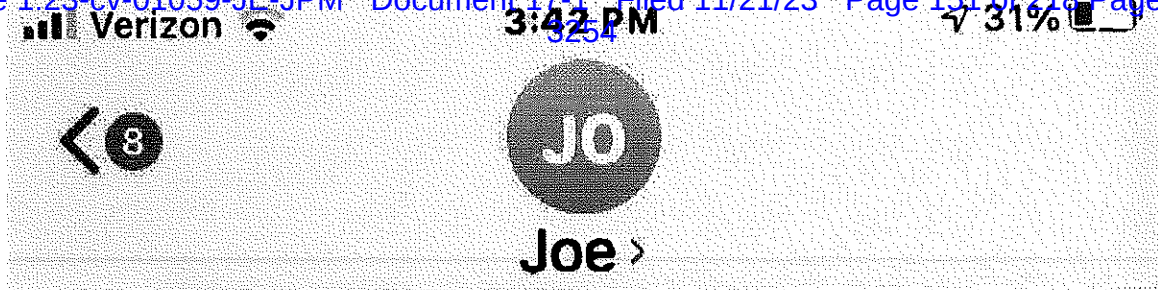


and to whom  
did he lie

Michigan  
grass roots  
conservatives  
tell me they are  
also being  
screwed over

iMessage





screwed over  
by rinos there

Whistleblow-  
ers being  
blocked

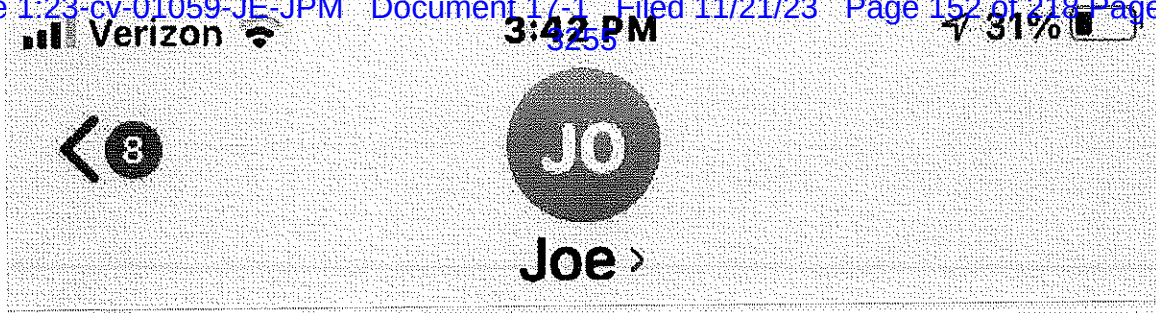
Yes

I don't under-  
stand this



iMessage





**Yes**

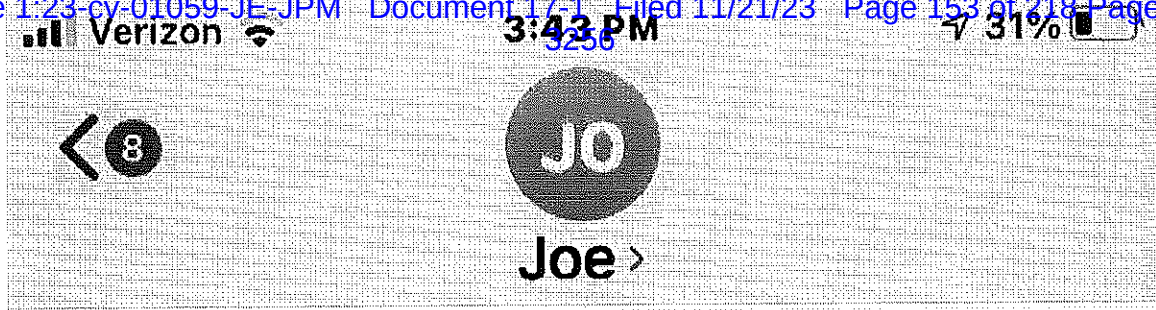
**I don't under-  
stand this**

**Why???**

**This is pure  
evil**







**Sat, Dec 5, 9:51 AM**

**Hey. John Baker states today, Eric Coomer is the smoking gun. He is the motive...**

**Sat, Dec 5, 9:57 AM**



**iMessage**



**RC** Randy Corpron @

Call when able re Dominion  
Nov 11, 2020 1:36pm

Yup. Anytime.  
Nov 11, 2020 2:12pm

Good.  
Nov 15, 2020 11:11am

  
Missed audio call  
Nov 11, 2020 2:29pm



just got off livestream and have another taping...can call after 430pm if that works  
Nov 11, 2020 2:09pm

Sidney Powell is talking to Joe this morning after watching our livestream  
Nov 15, 2020 11:05am







**Randy Corporon** @

Call when able re Dominion

Nov 11, 2020 1:36pm

Yup. Anytime.

Nov 11, 2020 2:12pm

Good.

Nov 15, 2020 11:11am

And, good job!

Nov 15, 2020 11:11am

Nov 11, 2020 2:29pm



just got off livestream and have another taping...can call after 430pm if that works

Nov 11, 2020 2:09pm

Sidney Powell is talking to Joe this morning after watching our livestream

Nov 15, 2020 11:05am



--

*From: Michelle Malkin <[writemalkin@gmail.com](mailto:writemalkin@gmail.com)>  
Date: Tue, Nov 24, 2020 at 1:10 PM  
Subject: Sovereign Nation - Wednesday pretape - guests/contact info  
To: Pierce Sargeant <[pierces@newsmax.com](mailto:pierces@newsmax.com)>, Stephanie Cassidy  
<[stephaniec@newsmax.com](mailto:stephaniec@newsmax.com)>, Jaclyn Anastasakos <[jaclyna@newsmax.com](mailto:jaclyna@newsmax.com)>*

*My topic is: Hacking the Vote.*

*Guests:*

*Joe Oltmann, Colorado businessman, founder of FEC United & host of  
Conservative Daily podcast  
[joe@fecunited.com](mailto:joe@fecunited.com)  
303 667 5105*

*Victoria Toensing, Trump legal adviser and former Reagan Justice Department  
official  
202 255 8863  
[VT@digenovatoensing.com](mailto:VT@digenovatoensing.com)*

*best,  
michelle*

--

*Michelle Malkin  
[www.michellemalkin.com](http://www.michellemalkin.com)*

*\* \* \**

*From: Michelle Malkin <[writemalkin@gmail.com](mailto:writemalkin@gmail.com)>  
Date: Wed, Nov 25, 2020 at 12:30 AM  
Subject: Sovereign Nation script  
To: Pierce Sargeant <[pierces@newsmax.com](mailto:pierces@newsmax.com)>*

*Please let me know that you received this, thanks.*

*best,  
michelle*

**Exhibit  
PLTF 0026  
MALKIN**

[Note: Michelle's script was attached to this email; see below for text of script.]

*WELCOME TO SOVEREIGN NATION. I'M MICHELLE MALKIN.*

*OUR FOCUS TODAY: HACKING THE VOTE.*

*NEWSFLASH: IT HAS ALREADY HAPPENED AROUND THE WORLD. THAT'S WHAT THE PROPAGANDISTS OF THE FECKLESS FOURTH ESTATE IN AMERICA DON'T WANT YOU TO KNOW. THEY ALSO DON'T WANT YOU TO REMEMBER THAT THERE WAS A TIME – NOT VERY LONG AGO - WHEN IT SERVED THE LEFT-WING MEDIA'S IDEOLOGICAL AGENDA TO EXPOSE THE GRAVE SECURITY RISKS OF AUTOMATED VOTING MACHINES.*

*JUST TWO YEARS AGO, THE LIBERAL SOCIAL MEDIA OUTFIT NOWTHIS SOUNDED THE ALARM OVER VULNERABLE VOTING MACHINES WITH A VIDEO SHOWING THAT "A HACKER ONLY NEEDS 1 MINUTE TO CHANGE ELECTION RESULTS IN 24 STATES." TWITTER DIDN'T CENSOR OR LABEL IT. THEY JUST PRETEND IT DOESN'T EXIST.*

*SOT start at :31 "The serial console in the back" ...end 1:25 "prepped and ready to go, a minute."*

*<https://twitter.com/nowthisnews/status/1034614864180858880>*

*THREE COMPANIES IMPLICATED IN WORLDWIDE ELECTION MEDDLING SCANDALS ARE INTERTWINED THROUGH A LABYRINTH OF SHELL COMPANIES: DOMINION, SMARTMATIC, AND SEQUOIA. DOMINION VOTING SYSTEMS MANUFACTURES BOTH ELECTION HARDWARE AND SOFTWARE WITH HEADQUARTERS IN TORONTO, CANADA, AND DENVER, COLORADO. SMARTMATIC IS THE MULTINATIONAL CORPORATION THAT MAKES VOTE COUNTING MACHINES AS WELL AS SOFTWARE...AND IS PURPORTEDLY TIED TO THE LATE VENEZUELAN DICTATOR HUGO CHAVEZ'S REGIME. SMARTMATIC MACHINES HAVE USED DOMINION SOFTWARE. SEQUOIA, WHICH WAS ACQUIRED BY DOMINION IN 2010, MAKES VOTING MACHINES THAT HAVE USED SMARTMATIC SOFTWARE.*

*THE LOS ANGELES TIMES, MIAMI HERALD, CHICAGO CITY OFFICIALS, AND THE U.S. COMMITTEE ON FOREIGN INVESTMENT IN THE UNITED STATES HAVE ALL INVESTIGATED THE PERILS OF FOREIGN CONTROL OVER OUR ELECTIONS POSED BY ONE OR MORE OF THESE COMPANIES*

*AS FAR BACK AS 2006. CNN REPORTER KITTY PILGRIM FILED THIS REPORT FOR LOU DOBBS...*

*SOT start :31 "the use of some 19,000" and end at 1:37 "We believe this is a national security issue"*

*[https://www.youtube.com/watch?v=-s9PkuiIw2Q&feature=emb\\_logo](https://www.youtube.com/watch?v=-s9PkuiIw2Q&feature=emb_logo)*

*WATCHDOGS IN THE PHILIPPINES HAVE GRAPPLED WITH WHAT THEY BELIEVE IS WIDESPREAD SMARTMATIC AND DOMINION-RELATED ELECTION MANIPULATION FOR 10 YEARS. ATTORNEY AND FORMER FILIPINO CONGRESSMAN GLENN CHONG SCoured AUDIT LOGS TO UNCOVER HOW SMARTMATIC MACHINES HAD SOMEHOW PRELOADED AND TRANSMITTED THOUSANDS OF VOTES BEFORE POLLS EVEN OPENED.*

*SOT chong*

*Start :21 "Michelle, the term preloaded"...to :35 "they are signed"...pick up again 1:14 "we have 70,000 voters" and end at 1:30 "seven percent."*

*<https://twitter.com/michellemalkin/status/1331430647970230273>*

*CHONG NOTES SIMILARITIES IN HOW HE SAYS HIS RACE AND OTHERS IN THE PHILIPPINES WERE RIGGED WITH WHAT HAPPENED HERE IN AMERICA:*

*SOT chong (attached MP4)*

*:00 to :31 end at "that was his lead"...pick up again at 1:23 "within a few hours" and end at 1:40 "was wiped"*

*CHONG ALSO EXPOSED AUTOMATIC VOTE PADDING AND SHAVING MANIPULATION BY SMARTMATIC MACHINES, PLUS MISSING AND OUT OF SEQUENCE BALLOT IMAGES. HE CONFRONTED SMARTMATIC OFFICIALS WITH REAMS OF LOGS OUTLINING FRAUD. OTHER POLITICIANS TURNED UP THE HEAT:*

*SOT Marcos*

*<https://www.youtube.com/watch?v=B745Rq958G4>*

*3:32 "I'm sorry I have to say this"...end at 3:43 "a method of cheating to whoever pays them the most." (PLEASE ADD CAPTION)*



INSTEAD OF PROVIDING ANSWERS, SEVERAL SMARTMATIC OFFICIALS LEFT THE COUNTRY, INCLUDING VETERAN SMARTMATIC OFFICIAL HEIDER GARCIA (SCREENSHOT THIS PAGE - <https://www.tarrantcounty.com/en/elections/meet-the-staff.html>) THE VENEZUELAN-BORN OPERATIVE NOW SERVES AS ELECTION ADMINISTRATOR FOR TARRANT COUNTY, TEXAS – WHICH TURNED BLUE FOR THE FIRST TIME SINCE 1964 AFTER THE INTRODUCTION OF NEW ELECTRONIC VOTING MACHINES.

EVADING SCRUTINY SEEMS TO BE PART OF THE VOTE-HACKING PLAYBOOK. LAST WEEK, DOMINION OFFICIALS BAILED OUT OF A STATE LEGISLATIVE HEARING IN BATTLEGROUND PENNSYLVANIA. GOP STATE REPRESENTATIVE DAWN KEEFER ASKED THE QUESTIONS THEY WON'T ANSWER:

SOT Keefer start at :15 “Does Dominion”...end :45 “and who has control of that source code?”

<https://twitter.com/DawnRep/status/1329804317914779654>

WHO HAS CONTROL OVER OUR ELECTIONS? WHO HAS DOMINION OVER OUR VOTES – WE THE PEOPLE OR THE ELECTRONIC VOTING OLIGARCHS? WITHOUT FULL ELECTION TRANSPARENCY, THERE CAN BE NO ELECTION PEACE.

NEXT UP: DENVER BUSINESSMAN JOE OLTMANN JOINS ME TO DISCUSS HIS SHOCKING DISCOVERIES ABOUT DOMINION VICE PRESIDENT OF STRATEGY AND SECURITY ERIC COOMER AND MUCH MORE. STAY TUNED.

WELCOME BACK TO SOVEREIGN NATION. MY FIRST GUEST IS JOE OLTMANN, FOUNDER OF FEC UNITED AND HOST OF CONSERVATIVE DAILY...

WE'VE GOTTA TAKE A QUICK BREAK. WHEN WE COME BACK, VICTORIA TOENSING WILL UPDATE US ON THE TRUMP LEGAL TEAM'S LATEST BATTLES TO PROTECT THE VOTE. DON'T TOUCH THAT DIAL.

THANKS FOR STAYING WITH US. VICTORIA TOENSING IS A MEMBER OF THE TRUMP LEGAL TEAM AND A FORMER REAGAN JUSTICE DEPARTMENT ATTORNEY.

*THAT'S ALL THE TIME WE HAVE FOR TODAY. JOIN US NEXT TIME FOR ANOTHER EDITION OF SOVEREIGN NATION.*

*\* \* \**

***From:*** Michelle Malkin <[writemalkin@gmail.com](mailto:writemalkin@gmail.com)>  
***Sent:*** Wednesday, November 25, 2020 2:31 AM  
***To:*** Pierce Sargeant <[PierceS@newsmax.com](mailto:PierceS@newsmax.com)>  
***Subject:*** Sovereign Nation script

*Please let me know that you received this, thanks.*

*best,  
michelle*

*\* \* \**

***From:*** **Pierce Sargeant** <[PierceS@newsmax.com](mailto:PierceS@newsmax.com)>  
***Date:*** Wed, Nov 25, 2020 at 4:54 AM  
***Subject:*** RE: Sovereign Nation script  
***To:*** Michelle Malkin <[writemalkin@gmail.com](mailto:writemalkin@gmail.com)>

*I got the script. One question on the second Chong SOT. Is it from the full interview in the youtube link on the tweet below the one you put in the script?*

*Thanks,  
Pierce Sargeant  
Producer, Newsmax TV  
NewsmaxTV.com  
561.686.1165 EXT: 1867*

*\* \* \**

***From:*** **Elliot Jacobson** <[ElliotJ@newsmax.com](mailto:ElliotJ@newsmax.com)>  
***Date:*** Wed, Nov 25, 2020 at 9:53 AM  
***Subject:*** Important  
***To:*** Michelle Malkin <[writemalkin@gmail.com](mailto:writemalkin@gmail.com)>

*Cc: Pierce Sargeant <[PierceS@newsmax.com](mailto:PierceS@newsmax.com)>, Gary Kanofsky  
<[GaryK@newsmax.com](mailto:GaryK@newsmax.com)>*

*Hi Michelle, we are being extra diligent right now about how we cover certain stories as we are very much in the cross hairs given our significant growth I am sure you have seen some of the articles.*

*I am tied up until later today with show rehearsals for new launches so I have asked Gary Kanofsky our News Director to touch base with you (as he is doing with all weekend shows) on some guard rails we need to maintain and talk through your show.*

*Also I will have ratings for you shortly,  
Elliot*

*Elliot Jacobson  
EVP & Chief Content Officer, NewsmaxTV  
805 Third Ave, 22<sup>nd</sup> Floor  
New York, NY 10022  
(646) 616-3368 x3450*

*\* \* \**

Text message from Gary Kanofsky sent November 25th:





**DOMINION  
VOTING**



Our customers come first.

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
Provider Narrative for Dec 4th PERC Meeting



Prepared by: Steven Bennett, Regional Sales Manager  
Proposal Due Date: Tuesday, December 1, 2015 – 5 pm MT

**Exhibit  
PLTF 0027  
MALKIN**

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

## Table of Contents

Letter of Introduction .....	3
1) Preliminary Project Schedule .....	5
Project Management Communication .....	5
Proposed Project Plan .....	5
Certification .....	16
Procurement .....	16
Configuration, Installation, Testing and Training .....	16
2016 Primary Election Implementation .....	18
2016 General Election Implementation .....	20
Problem Escalation Procedure .....	21
2) Proposed Staffing .....	23
Dominion Colorado Project Team .....	23
Staff Qualifications .....	24
3) Updated Schedule of Activities in Other Jurisdictions .....	28
(a) Jurisdictions in which provider has deployed the temporarily approved (or a substantially similar) voting system .....	28
References .....	28
Democracy Suite Customers .....	29
(b) Jurisdictions in which provider has contractually committed to deploy voting system(s) in 2016-2020 .....	32
(c) Jurisdictions in which provider has an outstanding offer but has not yet contracted to deploy voting system(s) in 2016-2020. ....	33

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

## Letter of Introduction

To Members of the Colorado Pilot Election Review Committee:

Dominion Voting Systems, Inc. ("Dominion") welcomes the opportunity to present our staffing and implementation plan for the State of Colorado, for consideration as the Uniform Voting System (UVS) provider.

Peace of mind comes with knowing that a professional project team with dedicated resources is assigned from beginning through completion of the implementation. **The State of Colorado will benefit from Dominion's years of product installation and project management experience that is unmatched in the election industry.** Our Colorado project team includes some of Dominion's most experienced team members - professionals with ample experience and understanding of system implementations, best project management practices, training methodologies, and a passion for customer service.

The Dominion project management methodology has been developed through years of experience implementing both large and small voting solutions by individuals who know and understand elections. **As an established election provider in the United States, we have a diverse customer base with jurisdictions in 18 states that have successfully implemented our Democracy Suite<sup>®1</sup> system, including the States of California, Louisiana, New Mexico, and 52 counties in New York.** Best practices and lessons learned from each project have refined our approach and have been incorporated at each stage of the methodology, including our most recent pilots in the City and County of Denver and Mesa County. We are keenly aware of the realities involved and what it takes to make a smooth transition to a new voting system platform, as well as ample experience to ensure the success of all of Colorado's counties.

Dominion's project management approach is based on open communication with our customers at all times. We will work closely with the counties and the State to include their input throughout all stages of the project plan and establish effective Problem Escalation Procedures to address potential issues successfully. **One of the most important things that we do as a company is to always listen to our customer's needs.** We value an open, honest relationship with our customers, and we take every opportunity to act on their feedback and respond in a timely manner.

Our proposed project plan for the State of Colorado manages timelines for all key milestones, deliverables, training, Election Day support and post-election support for the 24 Colorado counties planning to transition in 2016. **We understand the service needs of large and small counties will be different given our support of both large and small Colorado counties today.** We are familiar not only with the unique needs of our current customers, but also with the legislative and electoral environment in Colorado. Over the past thirty years, Dominion personnel have worked with Colorado counties of all sizes, giving us a sophisticated understanding of how to deliver a uniform elections solution.

Colorado is Dominion's home state. Most of our proposed project staff are based in Colorado, and have a sincere desire to support the counties in which they live and work. Our corporate

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<sup>1</sup> Democracy Suite is a registered trademark of Dominion Voting Systems.

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

headquarters are based in Denver, which will become an essential home base of infrastructure and support for any future implementations in the state. As a Colorado based company that spends millions of dollars on salaries and expenses in state, your investment in our growth will be repaid with excellent products, local services and experience, Colorado job creation, increased tax revenue, and other benefits that can only come from "buying" local.

We firmly believe that we have the technology, resources and capacity to become Colorado's Uniform Voting System provider, and ensure the best pathway to your continued success. We are enthusiastic about the opportunity to work with each Colorado County Clerk and their staff. We are determined and committed to meet your every challenge. This is who we are. **This is the Power of Partnership.**

If you have any questions or feedback, please feel free to contact me at (909) 362-1715 or via email at [steven.bennett@dominionvoting.com](mailto:steven.bennett@dominionvoting.com).

Sincerely,

Steven Bennett  
Regional Sales Manager



State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

## 1) Preliminary Project Schedule

*At the time of the original RFP, the exact number of initial UVS counties was not known. For that reason, Section 5.3.12 of the original RFP requested you to provide a preliminary project schedule and staffing plan for a "large Colorado Target County...." Since the original RFP, the committee surveyed all Colorado counties and has determined that, at this juncture, **24 counties tentatively plan to convert to the new voting system before the June 28, 2016 Primary Election.** Please update the preliminary project schedule and staffing plan submitted with your original RFP response, to show how your organization will support the transition of the 24 counties before the 2016 Primary Election, giving due regard to the certification application and testing schedule set forth in the attached UVS timeline.*

### Project Management Communication

Dominion subscribes to a collaborative management approach, where transparency, frankness, and open communications drive our projects. The key aspects to effective management are planning and control processes. Through experience in several state installations, we have developed comprehensive project plans, and we implement controls to maintain schedules and quality standards.

Throughout the project lifecycle, our State Project Manager (PM) will coordinate with Colorado counties to deliver exceptional management performance and high-quality products in support of the project objectives. There will be monthly status reports and during review of the status reports, Colorado counties and Dominion will determine if adjustments are needed to ensure process and project improvements are captured.

Dominion management and the PM will perform the monthly project review, in order to provide tactical communication and transparency across the project and within the corporate structure. It is also an opportunity to promote innovation, table new ideas, and deliver professional support to the PM. The agenda for this meeting includes a review of the proposed schedule and assessment of progress on deliverables. Potential issues will be reviewed, and Dominion management will provide guidance on mitigation approaches.

In addition to formal monthly and independent corporate reviews, informal daily contact will help to keep Colorado counties abreast of all contract and task activities, performance levels, and issues. Open communication between the customer and the PM will allow issues to be raised, addressed, and mitigated. This feedback loop expedites issue resolution and the development of mutually agreed upon mitigation approaches, thus increasing customer satisfaction throughout the project lifecycle.

### Proposed Project Plan

The State of Colorado requires a comprehensive workplan based on well-established principles of project management. The structure of the plan includes key milestones, which allow the State of Colorado to see tangible progress.

Dominion has designed the State of Colorado workplan based on the following:

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

- 1) Dominion's workplan adheres to PMBOK standards and practices.
- 2) It is developed using MS Project and will be monitored/reported by using MS Project.
- 3) It is designed with key milestones (clear tangible deliverables) that are designed to mitigate risk to the extent possible.
- 4) Tasks are focused on accomplishing specific objectives.
- 5) The work breakdown structure is a logical progression of steps, activities, and subtasks that lead to tangible work products or deliverables.
- 6) Our plan provides Colorado counties with visibility into the tasks and schedule.
- 7) Our plan incorporates Dominion's prior experience in successfully implementing voting systems.
- 8) Our workplan is achievable and will be used to manage specific deadlines.

The proposed project workplan is based on our current understanding of project requirements from the UVS timeline provided and it draws from our extensive, real world implementation experience. This proposed project workplan and schedule will be adjusted in consultation with individual counties to establish the "baseline" plan.

Dominion's PM will closely follow the Colorado approved MS Project plan to identify variance that may indicate a problem. The PM will follow the Problem Escalation Process (PEP), provided after the project plan description, to report variances and propose mitigation actions. Additionally, the PM will update the plan on a weekly basis and provide Colorado counties with a monthly summary of project status reports and meetings. The task dependencies, resources, and critical path are available by viewing the plan in MS Project (provided in the electronic submission).

As noted above, the following project workplan is based on our current understanding of project requirements and key implementation dates. Therefore it will need to be revised in consultation with Colorado counties, in line with best practices outlined in the PMBOK. Until finalized, it should be considered draft and used for discussion purposes.

Project Implementation will be divided into the following five stages: Certification, Procurement and Logistics; Configuration, Installation, Training and Testing; 2016 Primary Election and; 2016 General Election.

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

Colorado 1.0		Task ID	Task Name	Mode	Duration	Start	Finish
0	0		Colorado 1.0		394 days	Tue 12/1/15	Wed 12/28/16
1	1		1 Project Milestones		314 days	Thu 12/31/15	Tue 11/8/16
2	2		1.1 Selection of UVS Finalist		0 days	Thu 12/31/15	Thu 12/31/15
3	3		1.2 County Contracts Negotiated and Signed		40 days	Mon 1/4/16	Fri 2/12/16
4	4		1.3 Certification of System		1 day	Tue 3/1/16	Tue 3/1/16
5	5		1.4 System Deployment to Counties		59 days	Wed 3/2/16	Fri 4/29/16
6	6		1.4.1 Deployment and Installation		31 days	Wed 3/2/16	Fri 4/1/16
7	7		1.4.2 Install Trusted Builds		26 days	Mon 4/4/16	Fri 4/29/16
8	8		1.5 Primary Election Milestones		58 days	Mon 5/2/16	Tue 6/28/16
9	9		1.5.1 Ballot Production		26 days	Mon 5/2/16	Fri 5/27/16
10	10		1.5.2 UOCAVA Ballot Deadline		1 day	Sat 5/14/16	Sat 5/14/16
11	11		1.5.3 Absentee ballots sent - Primary		17 days	Mon 6/6/16	Wed 6/22/16
12	12		1.5.4 L&A Testing - Primary		11 days	Tue 5/31/16	Fri 6/10/16
13	13		1.5.5 Voting Centers Open - Primary		9 days	Mon 6/20/16	Tue 6/28/16
14	14		1.5.6 Election Day - Primary		0 days	Tue 6/28/16	Tue 6/28/16
15	15		1.6 General Election Milestones		58 days	Mon 9/12/16	Tue 11/8/16
16	16		1.6.1 Ballot Production		26 days	Mon 9/12/16	Fri 10/7/16
17	17		1.6.2 UOCAVA Ballot Deadline		1 day	Sat 9/24/16	Sat 9/24/16
18	18		1.6.3 Absentee ballots sent - General		5 days	Mon 10/17/16	Fri 10/21/16
19	19		1.6.4 L&A Testing - General		11 days	Mon 10/10/16	Thu 10/20/16
20	20		1.6.5 Voting Centers Open - General		15 days	Mon 10/24/16	Tue 11/8/16
21	21		1.6.6 Election Day - General		0 days	Tue 11/8/16	Tue 11/8/16
22	22		2 Project Management		364 days	Thu 12/31/15	Wed 12/28/16
23	23		2.1 Initiate Project		23 days	Thu 12/31/15	Fri 1/22/16
24	24		2.1.1 Internal Project Kick-off		1 day	Thu 12/31/15	Thu 12/31/15
25	25		2.1.2 Kick-off with State		1 day	Wed 1/6/16	Wed 1/6/16
26	26		2.1.3 Kick-Off Meeting with Counties		12 days	Mon 1/11/16	Fri 1/22/16
27	27		2.2 System Certification		43 days	Tue 1/19/16	Tue 3/1/16
28	28		2.2.1 UVS Certification Tasks		43 days	Tue 1/19/16	Tue 3/1/16

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

Colorado 1.0					
ID	Task Name	Mode	Duration	Start	Finish
29	2.2.1.1 Deadline for Cert. App. With TDP	🔧	1 day	Tue 1/19/16	Tue 1/19/16
30	2.2.1.2 Completion of documentation review	🔧	1 day	Tue 1/26/16	Tue 1/26/16
31	2.2.1.3 Prepare and finalize Test Plan Agreement	🔧	1 day	Fri 1/29/16	Fri 1/29/16
32	2.2.1.4 Complete supplemental testing, if necessary	🔧	1 day	Mon 2/15/16	Mon 2/15/16
33	2.2.1.5 Certification of System	🔧	1 day	Tue 3/1/16	Tue 3/1/16
34	2.3 Project Management Meetings w State/Countries	🔧	346 days	Mon 1/18/16	Wed 12/28/16
35	2.3.1 Project Update Call	🔧	346 days	Mon 1/18/16	Wed 12/28/16
50	2.4 Dominion Internal Project Management Meetings	🔧	348 days	Fri 1/15/16	Tue 12/27/16
51	2.4.1 Project Update Call	🔧	348 days	Fri 1/15/16	Tue 12/27/16
86	3 Procurement and Logistics	🔧	30 days	Mon 2/1/16	Tue 3/1/16
87	3.1 Procurement	🔧	30 days	Mon 2/1/16	Tue 3/1/16
88	3.1.1 ICC system	🔧	30 days	Mon 2/1/16	Tue 3/1/16
89	3.1.1.1 Canon G1130	🔧	30 days	Mon 2/1/16	Tue 3/1/16
90	3.1.1.2 Kofax board and software	🔧	30 days	Mon 2/1/16	Tue 3/1/16
91	3.1.1.3 Dell all-in-one PC	🔧	30 days	Mon 2/1/16	Tue 3/1/16
92	3.1.1.4 i-Button programmer	🔧	30 days	Mon 2/1/16	Tue 3/1/16
93	3.1.1.5 Other Requested Supplies and Consumables	🔧	30 days	Mon 2/1/16	Tue 3/1/16
94	3.1.2 ICX System	🔧	30 days	Mon 2/1/16	Tue 3/1/16
95	3.1.2.1 Tablets	🔧	30 days	Mon 2/1/16	Tue 3/1/16
96	3.1.2.2 Tablet Kiosk	🔧	30 days	Mon 2/1/16	Tue 3/1/16
97	3.1.2.3 Mag Stripper Reader	🔧	30 days	Mon 2/1/16	Tue 3/1/16
98	3.1.2.4 Hub multiport network	🔧	30 days	Mon 2/1/16	Tue 3/1/16
99	3.1.2.5 BMD Printer	🔧	30 days	Mon 2/1/16	Tue 3/1/16
100	3.1.2.6 Networking Hardware	🔧	30 days	Mon 2/1/16	Tue 3/1/16
101	3.1.2.7 Administrator Laptop	🔧	30 days	Mon 2/1/16	Tue 3/1/16
102	3.1.2.8 Voting Booth	🔧	30 days	Mon 2/1/16	Tue 3/1/16
103	3.1.2.9 Accessibility system hardware	🔧	30 days	Mon 2/1/16	Tue 3/1/16
104	3.1.2.10 Other Identified or Requested T Hardware	🔧	30 days	Mon 2/1/16	Tue 3/1/16
105	3.1.3 EMS and Adjudication Hardware	🔧	30 days	Mon 2/1/16	Tue 3/1/16



State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

Colorado 1.0					
ID	Task Mode	Task Name	Duration	Start	Finish
106	100	3.1.3.1 EMS Server	30 days	Mon 2/1/16	Tue 3/1/16
107	100	3.1.3.2 EMS Workstation	30 days	Mon 2/1/16	Tue 3/1/16
108	100	3.1.3.3 Adjudication Workstation	30 days	Mon 2/1/16	Tue 3/1/16
109	100	3.1.3.4 Network Security Devices	30 days	Mon 2/1/16	Tue 3/1/16
110	100	3.1.3.5 Monitors (2 server and Adjudication)	30 days	Mon 2/1/16	Tue 3/1/16
111	100	3.1.3.6 Keyboard, Mouse, Cables...	30 days	Mon 2/1/16	Tue 3/1/16
112	100	3.1.3.7 Report Printer	30 days	Mon 2/1/16	Tue 3/1/16
113	100	3.1.3.8 Other identified or Requested IT Hardware	30 days	Mon 2/1/16	Tue 3/1/16
114	100	4 Configuration, Installation, Training and Testing	182 days	Tue 12/1/15	Mon 5/30/16
115	100	4.1 System Configuration	51 days	Thu 12/31/15	Fri 2/19/16
116	100	4.1.1 Create Election Data Import Bridge	49 days	Thu 12/31/15	Wed 2/17/16
117	100	4.1.1.1 Examine existing data structure	21 days	Thu 12/31/15	Wed 1/20/16
118	100	4.1.1.2 Create data import bridge from customer database	21 days	Thu 1/21/16	Wed 2/10/16
119	100	4.1.1.3 Test import bridge and revise as required	7 days	Thu 2/11/16	Wed 2/17/16
120	100	4.1.2 Customization of configurable options	49 days	Thu 12/31/15	Wed 2/17/16
121	100	4.1.2.1 Finalize ballot style template	28 days	Thu 12/31/15	Wed 1/27/16
122	100	4.1.2.2 Define configurable settings	28 days	Thu 12/31/15	Wed 1/27/16
123	100	4.1.2.3 Finalize reporting templates	21 days	Thu 1/28/16	Wed 2/17/16
124	100	4.1.3 End-to-End Test	2 days	Thu 2/18/16	Fri 2/19/16
125	100	4.2 Installation and Acceptance Testing	121 days	Thu 12/31/15	Fri 4/29/16
126	100	4.2.1 Preparation for Acceptance Testing	86 days	Thu 12/31/15	Fri 3/25/16
127	100	4.2.1.1 Review County Operations Space	18 days	Thu 12/31/15	Sun 1/17/16
128	100	4.2.1.2 Issue space recommendations	5 days	Mon 1/18/16	Fri 1/22/16
129	100	4.2.1.3 Stage and Ship Delivery	25 days	Tue 3/1/16	Fri 3/25/16
130	100	4.2.1.3.1 Configure Servers	5 days	Tue 3/1/16	Sat 3/5/16
131	100	4.2.1.3.2 Test Servers	5 days	Mon 3/7/16	Fri 3/11/16
132	100	4.2.1.3.3 Internal Acceptance of ICX, ICC and Adjudication systems	10 days	Mon 3/14/16	Wed 3/23/16
133	100	4.2.1.3.4 Configure ICC Systems	10 days	Tue 3/1/16	Thu 3/10/16

Page 3

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

Colorado 1.0					
ID	Task	Task Name	Duration	Start	Finish
134	Mode	4.2.1.3.5 Test ICC Systems	10 days	Tue 3/1/16	Thu 3/10/16
135		4.2.1.3.6 Stage and Ship	12 days	Mon 3/14/16	Fri 3/25/16
136		4.2.2 Acceptance Testing	26 days	Mon 4/4/16	Fri 4/29/16
137		4.2.2.1 ICC Acceptance	19 days	Mon 4/4/16	Fri 4/22/16
138		4.2.2.2 Acceptance Testing of EMS Systems	19 days	Mon 4/4/16	Fri 4/22/16
139		4.2.2.3 Acceptance Testing of ICC Systems	19 days	Mon 4/4/16	Fri 4/22/16
140		4.2.2.4 End-to-End System Tests	5 days	Mon 4/25/16	Fri 4/29/16
141		4.3 Training	182 days	Tue 12/1/15	Mon 5/30/16
142		4.3.1 Finalize User Documentation	28 days	Tue 12/1/15	Mon 12/28/15
143		4.3.1.1 ICC Documentation	28 days	Tue 12/1/15	Mon 12/28/15
144		4.3.1.1.1 ICC User Guide	28 days	Tue 12/1/15	Mon 12/28/15
145		4.3.1.1.2 Acceptance Test Procedure, checklist and sign-off form	28 days	Tue 12/1/15	Mon 12/28/15
146		4.3.1.1.3 L&A Procedure, checklist and sign-off form	28 days	Tue 12/1/15	Mon 12/28/15
147		4.3.1.1.4 Poll-Worker Training Manual	28 days	Tue 12/1/15	Mon 12/28/15
148		4.3.1.2 ICC Documentation	28 days	Tue 12/1/15	Mon 12/28/15
149		4.3.1.2.1 ICC User Guide	28 days	Tue 12/1/15	Mon 12/28/15
150		4.3.1.2.2 Acceptance Test Procedure, checklist and sign-off form	28 days	Tue 12/1/15	Mon 12/28/15
151		4.3.1.2.3 Operator Training Manual	28 days	Tue 12/1/15	Mon 12/28/15
152		4.3.1.2.4 L & A Procedure, checklist and sign-off form	28 days	Tue 12/1/15	Mon 12/28/15
153		4.3.1.3 Adjudication	28 days	Tue 12/1/15	Mon 12/28/15
154		4.3.1.3.1 Adjudication Users Guide	28 days	Tue 12/1/15	Mon 12/28/15
155		4.3.1.3.2 Adjudication Quick Reference Guide	28 days	Tue 12/1/15	Mon 12/28/15
156		4.3.1.3.3 Operator Training Manual	28 days	Tue 12/1/15	Mon 12/28/15
157		4.3.1.3.4 L&A Procedure, checklist and sign-off form	28 days	Tue 12/1/15	Mon 12/28/15
158		4.3.1.4 EMS Documentation	28 days	Tue 12/1/15	Mon 12/28/15
159		4.3.1.4.1 EED Users guide	28 days	Tue 12/1/15	Mon 12/28/15
160		4.3.1.4.2 RTR Users guide	28 days	Tue 12/1/15	Mon 12/28/15

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

Colorado 1.0					
ID	Task Name	Mode	Duration	Start	Finish
161	4.3.2 Customer System Training	0	85 days	Mon 3/7/16	Mon 5/30/16
162	4.3.2.1 Region 1 Training	0	78 days	Mon 3/7/16	Mon 5/23/16
163	4.3.2.1.1 ICC/Adjudication Operations training	0	2 days	Mon 3/7/16	Tue 3/8/16
164	4.3.2.1.2 ICX Operations training	0	1 day	Wed 3/9/16	Wed 3/9/16
165	4.3.2.1.3 EMS / RTR Training	0	5 days	Mon 4/25/16	Fri 4/29/16
166	4.3.2.1.4 Pollworker Train the Trainer	0	1 day	Mon 5/23/16	Mon 5/23/16
167	4.3.2.2 Region 2 Training	0	73 days	Mon 3/14/16	Wed 5/25/16
168	4.3.2.2.1 ICC/Adjudication Operations training	0	2 days	Mon 3/14/16	Tue 3/15/16
169	4.3.2.2.2 ICX Operations training	0	1 day	Wed 3/16/16	Wed 3/16/16
170	4.3.2.2.3 EMS / RTR Training	0	5 days	Mon 5/2/16	Fri 5/6/16
171	4.3.2.2.4 Pollworker Train the Trainer	0	1 day	Wed 5/25/16	Wed 5/25/16
172	4.3.2.3 Region 3 Training	0	68 days	Mon 3/21/16	Fri 5/27/16
173	4.3.2.3.1 ICC/Adjudication Operations training	0	2 days	Mon 3/21/16	Tue 3/22/16
174	4.3.2.3.2 ICX Operations training	0	1 day	Wed 3/23/16	Wed 3/23/16
175	4.3.2.3.3 EMS / RTR Training	0	5 days	Mon 5/9/16	Fri 5/13/16
176	4.3.2.3.4 Pollworker Train the Trainer	0	1 day	Fri 5/27/16	Fri 5/27/16
177	4.3.2.4 Tier 1.1 Counties Training	0	64 days	Mon 3/28/16	Mon 5/30/16
178	4.3.2.4.1 ICC/Adjudication Operations training	0	2 days	Mon 3/28/16	Tue 3/29/16
179	4.3.2.4.2 ICX Operations training	0	1 day	Wed 3/30/16	Wed 3/30/16
180	4.3.2.4.3 EMS / RTR Training	0	5 days	Mon 5/2/16	Fri 5/6/16
181	4.3.2.4.4 Pollworker Train the Trainer	0	1 day	Mon 5/30/16	Mon 5/30/16
182	5 2016 Primary Election	0	87 days	Mon 4/4/16	Wed 6/29/16
183	5.1 Election Programming	0	56 days	Mon 4/4/16	Sun 5/29/16
184	5.1.1 Import Jurisdictional Data	0	16 days	Mon 4/4/16	Tue 4/19/16
185	5.1.1.1 Jurisdictional data Imported	0	1 day	Mon 4/4/16	Mon 4/4/16
186	5.1.1.2 Preliminary Election Database, Ballot and Report Creation	0	8 days	Fri 4/8/16	Fri 4/15/16
187	5.1.1.3 Initial Ballot Proofs Reviewed by Counties	0	1 day	Mon 4/18/16	Mon 4/18/16
188	5.1.1.4 Initial Report Proofing Packages Reviewed by Counties	0	1 day	Tue 4/19/16	Tue 4/19/16



State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

Colorado 1.0

ID	Task	Task Name	Mode	Duration	Start	Finish
189		5.1.2 Final Election Ballot and Database Creation		11 days	Mon 5/2/16	Thu 5/12/16
190		5.1.2.1 Ballot Certification Deadline for Primary		1 day	Mon 5/2/16	Mon 5/2/16
191		5.1.2.2 Final Ballot and Report Proofs to County Officials		8 days	Tue 5/3/16	Tue 5/10/16
192		5.1.2.3 Ballot and Report Review by Client		1 day	Wed 5/11/16	Wed 5/11/16
193		5.1.2.4 Revisions to Ballots and/or Reports		1 day	Thu 5/12/16	Thu 5/12/16
194		5.1.3 Election Materials Provided to County		17 days	Fri 5/13/16	Sun 5/29/16
195		5.1.3.1 Official Ballot Images generated		1 day	Fri 5/13/16	Fri 5/13/16
196		5.1.3.2 L&A Test Ballots Generated		8 days	Fri 5/13/16	Fri 5/20/16
197		5.1.3.3 Distribute Election Project Packages		7 days	Mon 5/23/16	Sun 5/29/16
198		5.2 Primary Election - Finalize Election Files & Logic and Accuracy Testing		12 days	Mon 5/30/16	Fri 6/10/16
199		5.2.1 County Receives and Restores Election package		1 day	Mon 5/30/16	Mon 5/30/16
200		5.2.2 Test ballots provided to printer		3 days	Tue 5/31/16	Thu 6/2/16
201		5.2.3 Load Election Files to ICC and ICX		1 day	Tue 5/31/16	Tue 5/31/16
202		5.2.4 Scan test ballots, upload and verify results		10 days	Tue 5/31/16	Thu 6/9/16
203		5.2.5 Export Results to State-wide System		1 day	Fri 6/10/16	Fri 6/10/16
204		5.3 Election Support - Primary Election		17 days	Mon 6/13/16	Wed 6/29/16
205		5.3.1 Mail Ballot Tabulation Support		16 days	Mon 6/13/16	Tue 6/28/16
206		5.3.1.1 Region 1		16 days	Mon 6/13/16	Tue 6/28/16
207		5.3.1.2 Region 2		16 days	Mon 6/13/16	Tue 6/28/16
208		5.3.1.3 Region 3		16 days	Mon 6/13/16	Tue 6/28/16
209		5.3.1.4 County Tier 1.1		16 days	Mon 6/13/16	Tue 6/28/16
210		5.3.1.5 County Tier 1.1		16 days	Mon 6/13/16	Tue 6/28/16
211		5.3.2 VSPC		9 days	Mon 6/20/16	Tue 6/28/16
212		5.3.2.1 Region 1		9 days	Mon 6/20/16	Tue 6/28/16
213		5.3.2.2 Region 2		9 days	Mon 6/20/16	Tue 6/28/16
214		5.3.2.3 Region 3		9 days	Mon 6/20/16	Tue 6/28/16
215		5.3.2.4 County Tier 1.1		9 days	Mon 6/20/16	Tue 6/28/16
216		5.3.2.5 County Tier 1.1		9 days	Mon 6/20/16	Tue 6/28/16

Page 6



State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>th</sup> PERC MEETING

Colorado 1.0		Task	Task Name	Duration	Start	Finish
ID	Mode					
217			5.3.3 Election Day Support	3 days	Mon 6/27/16	Wed 6/29/16
218			5.3.3.1 Region 1	3 days	Mon 6/27/16	Wed 6/29/16
219			5.3.3.2 Region 2	3 days	Mon 6/27/16	Wed 6/29/16
220			5.3.3.3 Region 3	3 days	Mon 6/27/16	Wed 6/29/16
221			5.3.3.4 County Tier 1.1	3 days	Mon 6/27/16	Wed 6/29/16
222			5.3.3.5 County Tier 1.1	3 days	Mon 6/27/16	Wed 6/29/16
223			6 General Election 2016	165 days	Tue 7/5/16	Fri 12/16/16
224			6.1 Project Plan Review and Update	28 days	Tue 7/5/16	Mon 8/1/16
225			6.1.1 Capture Lessons Learned	14 days	Tue 7/5/16	Mon 7/18/16
226			6.1.1.1 Internal Review	14 days	Tue 7/5/16	Mon 7/18/16
227			6.1.1.2 Stakeholder consultations	14 days	Tue 7/5/16	Mon 7/18/16
228			6.1.1.3 Review issues log	14 days	Tue 7/19/16	Mon 8/1/16
229			6.1.2 Revise Project Plan and Project Schedule	14 days	Tue 7/19/16	Mon 8/1/16
230			6.1.3 Revise Project and User Documentation	14 days	Tue 7/19/16	Mon 8/1/16
231			6.2 General Election Supplemental Training for Trainers	16 days	Mon 9/19/16	Tue 10/4/16
232			6.2.1 Region 1 Training	2 days	Mon 9/19/16	Tue 9/20/16
233			6.2.1.1 Refresh Training	2 days	Mon 9/19/16	Tue 9/20/16
234			6.2.2 Region 2 Training	2 days	Wed 9/21/16	Thu 9/22/16
235			6.2.2.1 Refresh Training	2 days	Wed 9/21/16	Thu 9/22/16
236			6.2.3 Region 3 Training	2 days	Mon 9/26/16	Tue 9/27/16
237			6.2.3.1 Refresh Training	2 days	Mon 9/26/16	Tue 9/27/16
238			6.2.4 County Tier 1.1	2 days	Wed 9/28/16	Thu 9/29/16
239			6.2.4.1 Refresh Training	2 days	Wed 9/28/16	Thu 9/29/16
240			6.2.5 County Tier 1.1	2 days	Mon 10/3/16	Tue 10/4/16
241			6.2.5.1 Refresh Training	2 days	Mon 10/3/16	Tue 10/4/16
242			6.3 Election Programming - General Election	25 days	Tue 9/6/16	Fri 9/30/16
243			6.3.1 Import Jurisdictional Data	4 days	Tue 9/6/16	Fri 9/9/16
244			6.3.1.1 Jurisdictional data imported	1 day	Tue 9/6/16	Tue 9/6/16

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

Colorado 1.0					
ID	Task	Task Name	Duration	Start	Finish
245	Mode	6.3.1.2 Preliminary Election Database, Ballot and Report Creation	2 days	Wed 9/7/16	Thu 9/8/16
246	Mode	6.3.1.3 Initial Ballot Proofs Reviewed by Counties	1 day	Fri 9/9/16	Fri 9/9/16
247	Mode	6.3.2 Final Election Ballot and Database Creation	9 days	Mon 9/12/16	Tue 9/20/16
248	Mode	6.3.2.1 Ballot Certification Deadline for General	1 day	Mon 9/12/16	Mon 9/12/16
249	Mode	6.3.2.2 Final Ballot and Report Proofs to County Officials	8 days	Tue 9/13/16	Tue 9/20/16
250	Mode	6.3.2.3 Ballot and Report Review by Client	1 day	Tue 9/13/16	Tue 9/13/16
251	Mode	6.3.2.4 Revisions to Ballots and/or Reports	1 day	Wed 9/14/16	Wed 9/14/16
252	Mode	6.3.3 Election Materials Provided to County	16 days	Thu 9/15/16	Fri 9/30/16
253	Mode	6.3.3.1 Official Ballot Images generated	1 day	Thu 9/15/16	Thu 9/15/16
254	Mode	6.3.3.2 L & A Test Ballots Generated	8 days	Fri 9/16/16	Fri 9/23/16
255	Mode	6.3.3.3 Distribute Election Project Packages	7 days	Sat 9/24/16	Fri 9/30/16
256	Mode	6.4 General Election - Finalize Election Files & Logic and Accuracy Testing	16 days	Wed 10/5/16	Thu 10/20/16
257	Mode	6.4.1 County Receives and Restores Election package	1 day	Wed 10/5/16	Wed 10/5/16
258	Mode	6.4.2 Test ballots provided to printer	3 days	Thu 10/6/16	Sat 10/8/16
259	Mode	6.4.3 Load Election Files to ICC and ICX	1 day	Mon 10/10/16	Mon 10/10/16
260	Mode	6.4.4 Scan test ballots, upload and verify results	10 days	Mon 10/10/16	Wed 10/19/16
261	Mode	6.4.5 Export Results to State-wide System	1 day	Thu 10/20/16	Thu 10/20/16
262	Mode	6.5 Election Support - General Election	54 days	Mon 10/24/16	Fri 12/16/16
263	Mode	6.5.1 Mail Ballot Tabulation Support	16 days	Mon 10/24/16	Tue 11/8/16
264	Mode	6.5.1.1 Region 1	16 days	Mon 10/24/16	Tue 11/8/16
265	Mode	6.5.1.2 Region 2	16 days	Mon 10/24/16	Tue 11/8/16
266	Mode	6.5.1.3 Region 3	16 days	Mon 10/24/16	Tue 11/8/16
267	Mode	6.5.1.4 County Tier 1.1	16 days	Mon 10/24/16	Tue 11/8/16
268	Mode	6.5.1.5 County Tier 1.1	16 days	Mon 10/24/16	Tue 11/8/16
269	Mode	6.5.2 VSPC support	16 days	Mon 10/24/16	Tue 11/8/16
270	Mode	6.5.2.1 Region 1	16 days	Mon 10/24/16	Tue 11/8/16
271	Mode	6.5.2.2 Region 2	16 days	Mon 10/24/16	Tue 11/8/16

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

Colorado 1.0					
ID	Task Mode	Task Name	Duration	Start	Finish
272	0	6.5.2.3 Region 3	16 days	Mon 10/24/16	Tue 11/8/16
273	0	6.5.2.4 County Tier 1.1	16 days	Mon 10/24/16	Tue 11/8/16
274	0	6.5.2.5 County Tier 1.1	16 days	Mon 10/24/16	Tue 11/8/16
275	0	6.5.3 Election Day Support	3 days	Mon 11/7/16	Wed 11/9/16
276	0	6.5.3.1 Region 1	3 days	Mon 11/7/16	Wed 11/9/16
277	0	6.5.3.2 Region 2	3 days	Mon 11/7/16	Wed 11/9/16
278	0	6.5.3.3 Region 3	3 days	Mon 11/7/16	Wed 11/9/16
279	0	6.5.3.4 County Tier 1.1	3 days	Mon 11/7/16	Wed 11/9/16
280	0	6.5.3.5 County Tier 1.1	3 days	Mon 11/7/16	Wed 11/9/16
281	0	6.5.4 Project Plan Review and Update	33 days	Mon 11/14/16	Fri 12/16/16
282	0	6.5.4.1 Capture Lessons Learned	33 days	Mon 11/14/16	Fri 12/16/16
283	0	6.5.4.1.1 Internal Review	5 days	Mon 11/14/16	Fri 11/18/16
284	0	6.5.4.1.2 Stakeholder consultations	5 days	Mon 12/5/16	Fri 12/9/16
285	0	6.5.4.1.3 Review issues log	5 days	Mon 12/12/16	Fri 12/16/16

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

## **Certification**

Dominion shall participate and comply with all items prescribed by the UVS committee for certification including:

- Deadline for finalist to file Applications for Certification with State Elections Division Voting Systems Team, together with Technical Data Package (TDP) consisting of all system documentation, prior certifications and test reports: 1/19/2016
- Completion of documentation review: 1/26/2016
- Prepare and finalize Test Plan Agreement, if final system differs from system temporarily authorized: 1/29/2016
- Complete supplemental testing, if necessary: 2/15/2016
- Certification of system, issuance of conditions of use (if any), and county authorization to purchase: 3/1/2016

As part of the implementation cycle, Dominion will continue to solicit feedback from our customers, including our Colorado counties. This feedback loop will feed back into our development cycle, and as we develop additional features and improvements, these will be put back into certification working with the State.

## **Procurement**

Procurement will be conducted in a manner that allows the coordination of supplies and consumables to be shipped directly to each county. During the procurement phase of the project, all of the commercial off the shelf components used in our election system are purchased.

While it would be preferable for all parties to identify final quantities of all supplies and consumables required for Election Day on the initial contract, provision in the project plan has been made to allow incremental orders to be placed following change management processes.

## **Configuration, Installation, Testing and Training**

### System Configuration

The Dominion Voting Democracy Suite Election Management System (EMS) is a configurable election system that can be adapted to meet the needs of any jurisdiction. The initial steps in each installation involve working closely with the county to ensure that the system is deployed in a manner that meets all jurisdiction requirements. The following steps are required:

**Create Election Data Import Bridge** – In this series of steps, Dominion works with the IT professional responsible for the creation and maintenance of SCORE to create a bridge that allows the direct import of jurisdictional data into the Democracy Suite EMS. This step



State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

dramatically increases the speed and accuracy of the creation of the election database within the Democracy Suite EMS. As a result, election divisions, contests, candidate names, propositions and other essential data will be inputted only once, reducing the likelihood of user error. Normally several iterations are required, and some manual data adjustment may be required.

Tiers 1, 4, 2 and 3 counties will have the option to use Dominion staff for database creation in our Colorado local office on equipment that has had the trusted build installed by the Secretary of State staff.

**Customization of Configurable Options** – Basic compliance with the requirements will have been demonstrated in the certification of the Democracy Suite line of products; however additional customization may be required. During this stage, final input and approval on ballot layouts, reports content, and the configuration of the options to the ImageCast<sup>®2</sup> Central and ImageCastX may be requested. This step takes place at the same time that the data import bridge is created.

**Create Audio Ballot Production Process** – Dominion understands the importance of generating accurate and easily understood audio ballots. As part of the initial configuration process and during the election cycle, Dominion and the counties will leverage existing processes, tools and systems to generate audio ballots.

Staging and Logistics

Dominion deliveries take place on a continuous basis. In this way, the acceptance process can operate in a just-in-time basis, thus minimizing the need to handle equipment twice, and reducing the burden and disruption to the acceptance test process during the scheduled delivery dates.

At the same time, delivery of the IT hardware and central count scanning system will take place. This allows Dominion technicians to begin installation of election servers in parallel with equipment acceptance. In this way, counties will have the benefit of being able to work with the complete election system immediately upon delivery of the tabulators.

Installation and Acceptance Testing

**Preparation for Acceptance Testing** - A Dominion technical lead will provide guidelines to the counties for acceptance testing and coordinate dates with the Secretary of State staff for trusted build installation. This includes assessing suitability and identifying any modifications required, identifying areas for each process including a secure area for inventory control, preparing necessary acceptance documentation, and ensuring all necessary supplies are available.

**Acceptance Testing** – Dominion and county staff will conduct detailed acceptance testing of the voting equipment. This acceptance testing provides assurance of full product functionality. Acceptance testing is an essential part of the Dominion quality assurance process. While it is our goal that all election equipment arrive to the county in perfect condition, it is normal to see a

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<sup>2</sup> ImageCast is a registered trademark of Dominion Voting Systems.

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

small number of issues that may fail initial acceptance. A Dominion employee will be on-site during the tabulator acceptance test process to assist, answer questions, troubleshoot, and where necessary complete minor adjustments.

**Installation of EMS** – IT Servers will be procured and shipped to Dominion's Denver office where the servers will be prepared for the trusted build installation of the EMS system software.

### Training

At Dominion, our training methodology focuses on providing election administration staff the necessary knowledge for successful implementation and effective operation of our voting system. We accomplish this through tailored training, using various training formats, implementing adult learning principles, and proper course pacing. Training customization begins with tailoring our courses to a specific jurisdiction's needs. For example, for those counties that will rely on Dominion to provide election services, such as building the voting system database, the training curriculum will only focus on the aspects of the system pertaining to how they will deploy it. Counties that will be doing their own election programming will be trained on how to do so using the Democracy Suite EMS. Another aspect of the customization is using different formats for training, including instructor-led classes in person, and instructor-led classes online.

Tier 1.1 counties will have their own county project managers that will be dedicated to their accounts. This is based on the size of the jurisdiction and need for a more intimate approach dealing with larger staff. Often, election preparation schedules prevent the delivery of training at the optimal time for retention on Election Day. This can be particularly apparent in small counties, where a very limited team is responsible for all election related activities. To that end, Dominion proposes a regional training program for all other tiered counties where regional project managers will be dedicated to multiple counties. All counties regardless of size will have a technical project manager, product specialist(s), documentation & training specialist(s), voter outreach and a networking hardware specialist. Training for the regional accounts will be combined which allows questions and concerns from multiple counties to be heard. This will facilitate ideas on how our training program can work best for each county, and allow trainees to discuss concerns with the implementation that can help all involved. This type of training does not affect VSPC or election night support requirements for each individual county.

## **2016 Primary Election Implementation**

### Election Programming

For those counties where Dominion will be providing election programming services such as database programming and generating ballots, the following steps outline this phase of the implementation.

The creation of the election database is a critical step in the election implementation. Given the very limited time available between the certification of the final ballot and the distribution of UOCAVA / Absentee ballots, it is very important that timelines are appropriately managed.

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

Dominion employs an iterative approach to ballot and report creation, where successive rounds of proofs are provided to election officials as more information becomes available. Using this approach, in many cases ballots have already been approved by the time they are certified, maximizing the time available for pre-election testing and logistics.

Dominion is familiar with the level of care and attention, and the rigorous proofing that election data should receive. While we are strong advocates of exercising rigor and caution during the ballot production phase, some or all of the iterative steps described below may not be required. This decision will be made by the Dominion PM in conjunction with the county following system configuration and end-to-end testing.

**Import Jurisdictional Data** - Using the data import bridge created during configuration, the Dominion project team will create an initial election database, ballots and reports using approved templates. Dominion staff will review the database for internal consistency, and provide draft proofing packages to the county for review.

**Final Election Ballot and Database Creation** – As soon as possible following the certification of final election data, the Dominion project team will provide final ballot proofs to the county.

**Election Materials Provided to or Generated by the County** – Final ballot PDF images are provided to the county for provision to certified printers. Election Project back-ups are uploaded to a secure transfer site for restoration on election servers.

**Generate Audio Files** – Dominion uses machine synthesized audio files for the ImageCast X systems.

Logic and Accuracy Testing

Logic and Accuracy testing (L&A) is the responsibility of the counties. The Dominion project team will be available throughout the L&A process available to assist on an as required basis.

To facilitate the L&A process, Democracy Suite has an optional, stand-alone test deck generation utility that can be employed by certified printers, or sold separately for the automated creation of pre-marked test decks. These decks are always marked with 100% accuracy, allowing for increased confidence in the L&A process.

Dominion recommends that L&A testing include the upload of results files to the election database, so that a full end-to-end test of the relevant election is completed prior to Election Day.

Election Support

The Dominion project team will reach an agreement with the county on their specific roles during VSPC voting and Election Night. Dominion takes pride in our ability to transfer to local officials the skills necessary to conduct even complex elections with complete autonomy. As an example, following the successful initial deployment of Democracy Suite in Mongolia in June 2012, a nation-wide Presidential election was subsequently conducted by the Mongolian General Election Commission with only two Dominion staff members in-country. Throughout the

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

election, their role was simply to respond to questions and to be available in case of unexpected performance issues, of which there were none. This is a testament not only to Dominion's strength as capacity-builders, but also the reliability and ease of use of our systems.

## 2016 General Election Implementation

The Election support plan for the 2016 General Election is the same as the support plan for the 2016 Primary.

### Project Plan Review and Update

In accordance with accepted project management practice, Dominion will conduct a project review upon completion of the 2016 Primary Election. The counties will be consulted, and a review of change orders and PEP tickets will be conducted. On completion of these reviews, project documentation and the project plan will be revised to reflect learning from the Primary Election. This will be presented to the counties for their approval prior to moving forward with the implementation of the 2016 General Election.



State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

## Problem Escalation Procedure

During the normal course of implementing Democracy Suite, Dominion staff works closely with customers to establish a clear and timely flow of information. This communication helps reduce the number of issues and support early identification of problems that may require resolution through the Problem Escalation Procedure (PEP).

Dominion has successfully applied the proposed PEP to implementations in States of Louisiana, New Mexico, Nevada and many other large jurisdictions. The proposed process has the following key steps:

- **Problem Identification** – Customer identifies a problem or Dominion proactively identifies a problem.
- **Problem Analysis** – The Dominion PM will describe, document, and log the problem into Dominion's automated ticket tracking system. They will notify appropriate Customer/Dominion staff of the severity and risk of the problem.
- **Problem Mitigation Plan (PMP)** – The Dominion PM will lead a team to identify the root cause, determine/document mitigation approach, and identify the management point of contact for approval of the PMP.
- **Mitigation Execution** – The team will execute the approved PMP and track resolution.
- **Problem Escalation Process** – The Dominion PM will escalate a problem based on exceeding the resolution target time or at their discretion.
- **Problem Close-out** – The Dominion PM will document problem, resolution, and lessons learned. The PM will also close out the item on the problem and risk logs.

**Problem Identification** – The Project Management Institute (PMI) defines a problem or issue as a variance between planned and actual performance in terms of schedule, resource allocation, technical performance, or quality. A problem or potential problem can be identified by Colorado counties or proactively by Dominion staff.

**Problem Analysis** – The Dominion PM will work with the individual that identified the problem and Dominion staff to clearly characterize the issue, assess its severity, and determine the initial mitigation strategy. The Dominion PM will update the problem log (Dominion's automated ticket tracking system) and make an entry into the risk log if necessary.

**Problem Mitigation Plan (PMP)** – The Dominion PM will work with key Dominion and Colorado county staff to identify the root cause and to determine a mitigation approach. They will document the approach and seek authorization (if necessary) from the Colorado PM to execute the PMP. The Dominion PM will carefully analyze the PMP to avoid implementing a mitigation solution that causes more problems or does not address the root cause.

**Mitigation Execution** - The Dominion PM will lead, monitor, and report on the execution of the PMP. The Dominion PM will monitor the problem on daily or weekly bases during mitigation execution. If the PMP results in problem resolution, the Dominion PM will close out the problem. If the PMP fails to address the problem, the Dominion PM will notify the state and execute the escalation procedure.

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

**Problem Close Out** – The Dominion PM will update the problem and risk logs, document lessons learned, and report the problem in the monthly status report.

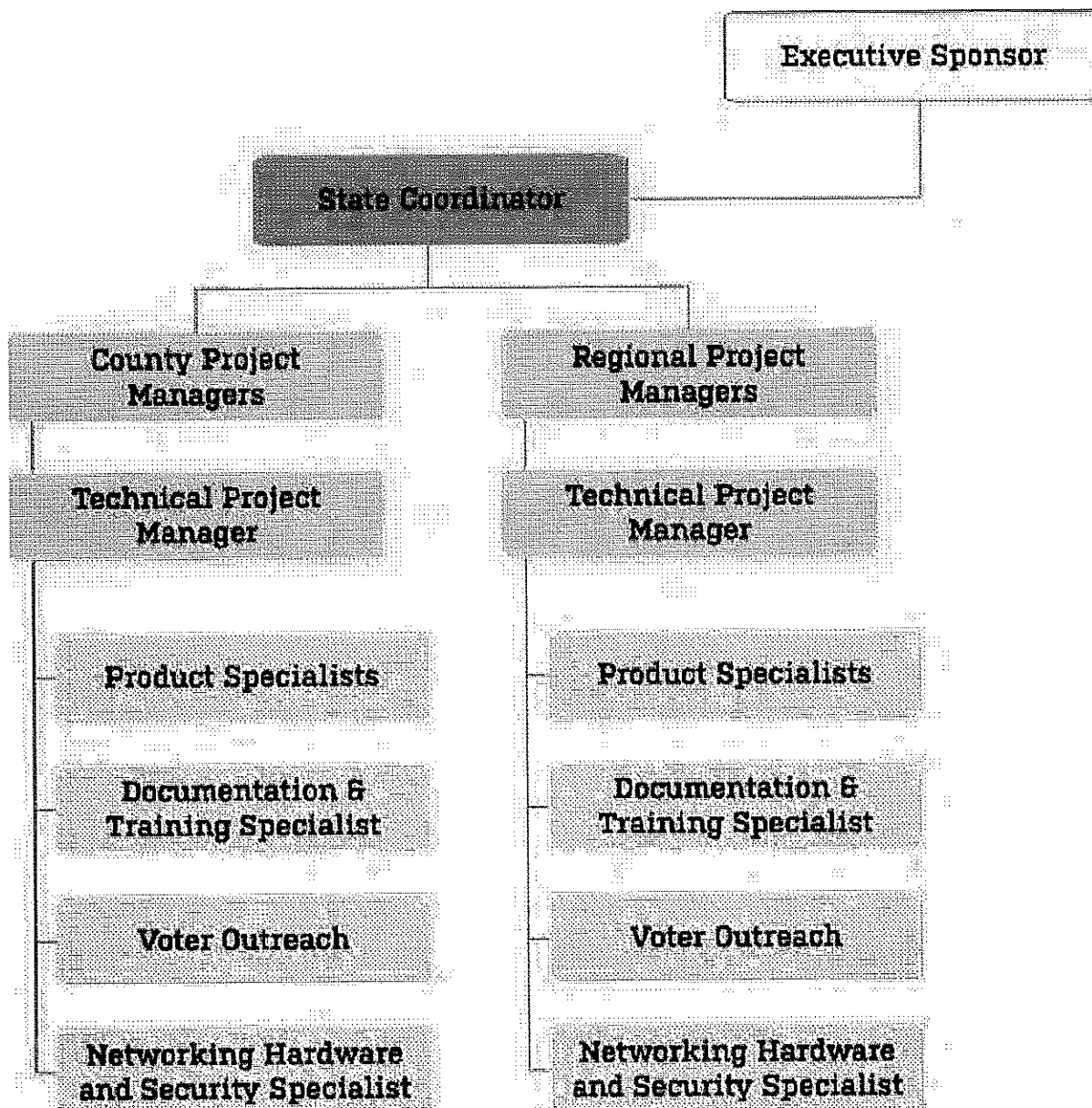
**Problem Escalation** – If the PMP is not completed within the specified Target Resolution Time, the Dominion PM will execute problem escalation process.

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

## 2) Proposed Staffing

*Section 5.3.13 of the original RFP requested you to identify and provide information about proposed staffing to implement UVS. To the extent necessary, please update your original RFP response on this issue.*

### Dominion Colorado Project Team



State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

## Staff Qualifications

### **Executive Sponsor – Mike Frontera**

As Executive Vice-President of Operations, Mike brings over 22 years of election experience to Dominion's operations team, which manages voting system implementations, customer relations, election support, training and sales support. Mike was the Executive Sponsor for a number of large Dominion implementations including the country of Mongolia and States of New York and Louisiana. Prior to joining Dominion, Mike was the Vice President of Operations for Sequoia Voting Systems for over seven years. Mike began his career working in the public sector, including serving as the Election Director for the City and County of Denver. Mike is licensed to practice law in the State of Colorado and holds a Juris Doctor from the University of Arizona College of Law, as well as a Bachelor of Arts in Psychology.

### **Regional Sales Manager (Primary Business Contact) - Steven Bennett**

Steven Bennett is the Regional Sales Manager for the State of Colorado, and responsible for all activities in the State. He has been involved in the sale and installation of election solutions for the past 10 years, in California, Colorado and New Mexico. Steven has studied the process by which jurisdictions deploy voting systems, understands how counties procure the equipment they need, and the role of the State in elections and voting system implementation. He has expertise in developing election solutions for state and county needs, cultivating partnerships to ensure successful collaboration between the customer and the company. Additionally, Steven has been instrumental in translating customer needs into R&D priorities for the companies, ensuring that customers have the products they truly need.

Steven received a Bachelor of Science in Business Administration, with a focus on Finance, from Indiana University of Pennsylvania in 1988. Steven will be your contact for the duration of the contract.

### **Director of Operations, West – Sheree Noell**

A seasoned professional, Sheree has more than twenty years of experience in the elections industry. She has extensive experience in ballot printing, optical scan and direct record electronic tabulation, audio voting, precinct and central count environments. Sheree has served as the Director of Operations, Sales manager and Project/Implementation Manager on various installs in California, Washington, Oregon and Nevada. Most recently, Sheree manages the day to day activities of the Western Region, which includes over 100 separate jurisdictions and 20+ personnel resources. Sheree is a direct liaison to customers and is stationed in California. From this strategic location she can ensure the provision of day to day services and actively participate with her team and customers in planning for future election cycles and needed services. Sheree received her under-grad degree from College of the Sequoias. Sheree is currently enrolled in the Election Center's CERA/CERV Professional Education Program.



State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

#### **Customer Relations Manager – Geneice Mathews**

Geneice Mathews is the in-state Customer Relations Manager for the State of Colorado responsible for Project management of multiple, parallel projects within the state. These tasks include new equipment installations, preventative maintenance and state wide election support activities. Geneice has a stellar record of customer satisfaction, and has been a great asset for investigating and solving customers' problems, which may be complex or long-standing problems. She has over 14 years of elections experience having held many positions in the company. From her start as a QA Analyst, to her experience in product management, election programming and implementation, testing, technical documentation and election support, and now as Customer Relations Manager, Geneice has a deep understanding of Dominion's systems, products and services. She helped manage numerous county and international implementations, and specifically state implementations of Nevada and Louisiana. Geneice received a Bachelor of Arts in Political Science and German at the University of Longwood in Virginia.

#### **Product Specialist – Lisa Flanagan-Crane**

Lisa is based out of Colorado and has worked in Elections Administration for 16 years. During that time, Lisa has been Project Manager of Voting System installations for multiple Colorado counties, provided software/hardware training and election judge training for customers, produced and printed Op-Tech ballots, provided support for Logic and Accuracy Testing, Public Tests, hardware preventative maintenance and supported customers in voter registration. Previous to Dominion/Sequoia, Lisa worked for the Colorado Department of State and Arapahoe County. While working in the Colorado Secretary of State Office, Lisa helped with upgrading 19 counties to a Windows based Voter Registration System, trained staff from each county, and ran the help desk. Lisa has visited over 25 election offices around the state, understands Colorado Election Law, and has worked hard to build an outstanding reputation for customer service.

Lisa has provided election support to jurisdictions in Arizona, California, Colorado, Illinois, Nevada, New Jersey, New Mexico, and Pennsylvania.

#### **Senior Product Manager – Ronald Morales**

Ronald Morales is a Systems Engineer with more than 15 years of experience, providing technological expertise and solutions to ensure quality implementation and integration of Dominion Voting System products.

Ronald began his career in elections when he joined Smartmatic in 2004 where he managed the EMS Quality Assurance process for elections in Venezuela. After the acquisition of Sequoia by Smartmatic, Ronald was responsible for the integration of Smartmatic's newly-developed equipment with Sequoia's EMS and for the EAC certification of the integrated solution.

When Dominion Voting Systems acquired Sequoia and assets of Premier Election Solutions in 2010, Ronald began working with modifications and new solutions in software and hardware for the Premier product line, along with the EAC certification process of the updated products.

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

In his current role, Ronald is engaged in the research and implementation of new technologies with a focus on reliability, performance and efficiency, for both existing legacy systems (Sequoia and Premier) and systems currently in development by Dominion. His most noticeable achievement is the design and implementation of fully redundant Dominion Democracy Suite EMS server infrastructure for the elections in Mongolia during 2012 and 2013.

**Director, Product Strategy - Eric Coomer**

Eric Coomer graduated from the University of California, Berkeley in 1997 with a Ph.D. in Nuclear Physics. After working in IT consulting for several years, Eric entered the elections industry in 2005 with Sequoia Voting Systems as Chief Software Architect. After three years with the company, Eric took over all development operations as Vice President of Engineering. When Sequoia was acquired by Dominion Voting Systems in 2010, Eric joined the DVS team as Vice President of US Engineering overseeing development in the Denver, Colorado office.

Recently, Eric has taken over as the Director of Product Strategy driving the creation of next generation products through close collaboration with customers, combined with a deep understanding of technology and the needs of Elections departments throughout the United States and abroad. Eric has been an active participant in the development of the IEEE common data format for Elections systems, as well as the working group for developing standards for Risk-Limiting Audits for elections results. When not designing new products, Eric supports large and small scale customers during Election season.

**Director, Product Strategy - David Moreno**

David Moreno is an accomplished and committed IT professional, with years of experience in software design, development, deployment, and testing.

David has more than 20 years of professional experience in the areas of IT support, IT infrastructure, capacity planning, system design and development, QA and QC processes applied to software and hardware development and full Product Lifecycle Management. David also brings over 10 years of experience in the election business, from working in the design and development of different voting equipment, to deploying new voting technology in counties like San Francisco and Alameda County, California. David's career has been full of learning experiences, like implementing the RCV (Ranked Choice Voting) vote tally system for the City of San Francisco and Alameda County and working on multiple demonstrations of voting technology in different countries and states.

**Product Specialist - Alyssa Prohaska**

Alyssa Prohaska has over 11 years of elections experience ranging from county elections administration to technical support, training, and quality assurance testing of election management, voter registration, and other web-based applications. Alyssa began working in elections as an Election and Campaign Finance Specialist with the Adams County Elections Division of the Clerk & Recorder Office in 2004. She has recently worked with the Colorado Secretary of State's office where she served in a technical and business support capacity -

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

testing, training, and providing tier 2 support of the voter registration and election management systems, and online voter registration applications.

Alyssa holds a Bachelor of Arts degree in Communication from the University of Denver, as well as a Master's of Science in Information Technology Management and Graduate Certificates in Oracle Database Administration, and Executive Information Technology from Regis University.

#### **Senior Software Developer – Benjamin Rice**

Benjamin Rice has over six years of experience in architecting, developing, and managing elections software solutions. He is a certified ScrumMaster and evangelist for Agile practices and technologies in software development. He has close to twenty years' experience in the Web development and client-service solutions world. Before joining Dominion, Ben was a senior software developer at Sequoia and Slice of Lime and director of technology with FOCL.

Ben graduated from Northwestern University with Bachelor of Arts degrees in both Psychology and English Literature.

#### **Manager, Certification – Jessica Bowers**

Jessica has been involved in the voting industry for over seven years in the R&D, engineering, and certification of voting systems. She has been involved in both state and federal level certifications and, most recently, led the Colorado provisional certification effort for Dominion's Universal Voting System entry. Jessica brings over 18 years of experience in development and Information Technology to her work with Dominion and is responsible for ensuring that the company's products are compliant with all state and federal certification standards.

Jessica earned a Bachelor of Science in Information Technology from the University of Phoenix in 2005 and is a U.S. Air Force veteran.

#### **Quality Assurance Analyst – Yaping Lou**

Yaping Lou is a Quality Assurance Analyst for our Denver development department, and is responsible for ongoing testing to ensure the high performance quality of Democracy Suite. She has expertise in testing all components of our products, understands processes of the equipment and implementation of the voting system. Yaping has experience in election support, collaboration between software development and testing, and developing product test procedures to ensure high quality and performance of products. She has seven years of work experience in the field of computer science, including software testing and development.

Yaping received a Master of Computer Science from the University of Colorado, Denver, and joined Dominion Voting in 2015.

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

### 3) Updated Schedule of Activities in Other Jurisdictions

*Please provide us with the information regarding your activities in other jurisdictions. For each of the following categories, please list the individual jurisdictions, and provide the name, title, telephone number and email address of your organization's principal local contact.*

(a) Jurisdictions in which provider has deployed the temporarily approved (or a substantially similar) voting system

Dominion's Democracy Suite voting system has been sold in 19 states. Below is a list of all election jurisdictions where the Democracy Suite system has been deployed, the major scanning components used (ImageCast Central, ImageCast Evolution, ImageCast Precinct, ImageCast X), and the year of signed business. Contact details for a cross section of customers are also provided in the references section. Should additional references be necessary, please contact our sales representative.

#### References

##### State of Louisiana

Contact Name: Angie Rogers, Commissioner of Elections, LA Secretary of State's Office  
Address: 8585 Archives Ave, Baton Rouge, LA, 70809  
Phone Number: 1-225-922-0900  
E-mail: [Angie.rogers@sos.louisiana.gov](mailto:Angie.rogers@sos.louisiana.gov)

The state of Louisiana uses a blend of Dominion products for precinct, early voting and absentee voting. In 2011, Louisiana bought the ImageCast Central absentee ballot counting system for all parishes in the State. The ImageCast Central system is a software-driven central count solution. For the State of Louisiana, the ImageCast Central software was paired with a Kodak Sidekick COTS scanner.

The State of Louisiana uses 110 ImageCast Central units to process their absentee ballots. The State has benefited from significant efficiencies and cost-savings through the use of this system, also being proposed for the State of Colorado. The complete system is administered and managed by the Secretary of State with support from the Dominion Team, and administered at the local level by the Registrar of Voters and Clerk of Court in each parish.

##### City and County of Denver

Amber McReynolds, Director of Elections  
Address: Denver Elections Division, 200 W 14th Ave #100, Denver, CO 80204  
Phone Number: 720-865-4850  
E-mail: [amber.mcreeynolds@denvergov.org](mailto:amber.mcreeynolds@denvergov.org)



State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4<sup>TH</sup> PERC MEETING

In 2015, the City and County of Denver streamlined their election processes by replacing their voting system - which required three vendors and seven different databases - with a single database to power the entire election – Democracy Suite. Denver selected the ImageCast Central to tabulate paper ballots, more than 90% of which came from ballots received by mail. Denver also implemented the ImageCast X, a tablet-based in-person voting device, which prints a paper ballot for tabulation by the ImageCast Central. Dominion provided training on all aspects of the system, technical services and support for system installation and configuration, early voting, Election Day voting and post-election activities. Dominion also provided a dedicated project manager for their May 2015 Municipal Election. Dominion worked closely with the City and County of Denver to configure the system to meet their needs and requirements.

**Clark County, Nevada**

Joe Gloria, Registrar of Voters

Address: 965 Trade Drive #1, North Las Vegas, NV 89030-7801

Phone: 702-455-2846

E-mail: [jpg@co.clark.nv.us](mailto:jpg@co.clark.nv.us)

Clark County, Nevada uses a blend of Dominion products for precinct, early voting and absentee voting. In 2015, Clark County upgraded their central count scanning system to Democracy Suite, deploying six ImageCast Central workstations paired with Canon G1130 scanners. Clark County also implemented Dominion's ImageCast Adjudication software for digital real-time adjudication of ballots with outstack conditions.

The State of Nevada has been a customer of Dominion and its predecessors for over 20 years, and this longstanding relationship is a testament to Dominion's commitment to outstanding customer service and support. Most of the original members of the Clark County install team in 1991 are still employed by Dominion Voting today and continue to provide support and services in the state.

**Democracy Suite Customers**

Below is a list of all election jurisdictions where the Democracy Suite system has been deployed, the major scanning components used (ImageCast Central - ICC, ImageCast Evolution - ICE, ImageCast Precinct - ICP, ImageCast X - ICX), and the year of signed business.

**52 Counties in the State of New York** (all except Albany, Erie, Nassau, Rockland, Schenectady and the five boroughs of New York City) (ICP, BMD, ICC - 2008)

**The State of New Jersey**

- Burlington County (ICC, 2014)
- Camden County (ICC, 2013)
- Cape May County (ICC, 2013)
- Cumberland County (ICC, 2015)
- Essex County (ICC, 2013)

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4th PERC MEETING

- Mercer County (ICC 2013)
- Monmouth County (ICC, 2014)
- Hunterdon County (ICC, 2015)
- Salem County (ICC, 2015)
- Gloucester County (ICC, 2015)
- Morris County (ICC, 2015)
- Passaic County (ICC, 2015)
- Union County (ICC, 2013)
- Hudson County (ICC, 2013)

**All 64 Parishes in the State of Louisiana (ICC, 2011)**

**The Commonwealth of Virginia**

- Caroline County (ICP BMD Audio, 2015)
- Isle of Wight County (ICE, 2011)
- King George County (ICP- BMD Audio, 2014)
- Bedford County (ICE, 2015)
- Page County (ICP- BMD Audio, 2014)
- Craig County (ICE, 2015)
- Franklin County (ICE, 2015)
- Louisa County (ICE, 2015)
- Mecklenburg County (ICE, 2015)
- Nottoway County (ICE, 2015)
- Suffolk City (ICE, 2015)

**The State of Ohio**

- Guernsey County (ICE, ICC, 2013)
- Harrison County (ICP, ICE, ICC, 2014)
- Huron County (ICC, ICE, ICP-AV, MBP, 2015)
- Belmont County (ICP-AV, ICC, 2015)

**The State of Tennessee**

- Hamilton County (ICE, ICP-A, ICC, 2013)

**The State of Iowa**

- Cedar County (ICP BMD Audio, 2013)
- Adair County (ICP, 2015)
- Hardin County (ICP-BMD Audio, ICC, 2015)
- Mitchell County (ICP-BMD Audio, 2015)

**The State of Florida**

- Baker County (ICE, 2013)
- Hardee County (ICE, 2013)
- Hernando (ICE-DD, ICC, MBP, 2015)
- Leon County (ICE, ICC, 2014)

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4th PERC MEETING

- Levy County (ICE, 2014)
- Madison County (ICE, 2013)
- Monroe County (ICE, 2013)
- St Lucie County (ICE, ICC, 2014)
- Alachua County (ICE, ICC, 2015)
- Flagler County (ICC, 2015)

**The State of New Mexico** (ICC, ICE, ICP BMD Audio, ICP, 2014)

**The State of Alaska**

- City and Borough of Sitka (ICP BMD Audio, 2014)

**The State of Massachusetts**

- Clinton County (ICP, 2015)
- Needham County (ICP, 2014)

**The State of Missouri**

- Adair County (ICP-BMD Audio, 2015)
- Warren County (ICP, 2015)
- Osage County (ICP-BMD Audio, 2015)
- Callaway County (ICP-BMD Audio, 2015)
- Crawford County (ICP-BMD Audio, 2015)
- Gasconade County (ICP-BMD Audio, 2015)
- Jasper County (ICP-BMD Audio, 2015)
- Maries County (ICP-BMD Audio, 2015)
- McDonald County (ICP-BMD Audio, 2015)
- Newton County (ICP-BMD Audio, 2015)
- Warren County (ICP-BMD Audio, 2015)
- Saline County (ICP-BMD Audio, 2015)
- Carroll County (ICP-BMD Audio, 2015)
- Lafayette County (ICP-BMD Audio, 2015)

**The State of Nevada**

- Clark County (ICC, 2015)

**The State of Colorado**

- City and County of Denver (ICC, ICX, 2015)
- Mesa County (ICC, ICX, 2015)

**The State of California**

- Imperial County (ICC, ICE, 2015)
- Kern County (ICC, 2015)

**The State of Kansas**

- Lane County (ICP-BMD Audio, 2015)

State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4th PERC MEETING

**The State of Utah**

- o Salt Lake County (ICC, 2014)

**The State of Minnesota**

- o Dakota County (ICC, ICE, 2015)
- o Scott County (ICC, ICE, 2015)

(b) Jurisdictions in which provider has contractually committed to deploy voting system(s) in 2016-2020

Dominion is contractually committed to deploy the Democracy Suite Voting System in the following jurisdictions in the United States:

**The Commonwealth of Puerto Rico**

**The State of California**

- o Del Norte County
- o Glenn County
- o Siskiyou County
- o Tehama County
- o Napa County

**The State of Florida**

- o Columbia County

**The State of Ohio**

- o Lorain County

**The State of Wisconsin**

- o Door County
- o Green County
- o Ozaukee County
- o Vilas County
- o Washington County
- o Winnebago County

Dominion has a number of distributors who provide election implementation services in various jurisdictions. Dominion and its distributors are contractually committed to deploy the Democracy Suite Voting System in the following jurisdictions:

**The State of Iowa**

- o Appanoose County
- o Wayne County
- o Lucas County

**The State of Missouri**

- o Livingston County



State of Colorado  
UNIFORM VOTING SYSTEM SUBMISSION  
PROVIDER NARRATIVE FOR DEC 4th PERC MEETING

- o Pike County
- o Grundy County
- o Mercer County
- o Harrison County
- o Montgomery County

**The Commonwealth of Virginia**
























- o Buchanan County
- o Dickenson County
- o Russell County
- o Lee County
- o Salem City
- o Amelia County
- o Waynesboro City




















**The State of Wisconsin**

- o Fond du Lac County

(c) Jurisdictions in which provider has an outstanding offer but has not yet contracted to deploy voting system(s) in 2016-2020.

Dominion continues to work with jurisdictions to provide upgrade paths and demonstrate new technologies. At this time, we do not have any outstanding offers for contractual commitments beyond 2015 for new implementations.
































ID	Task Mode	Task Name	Duration	Start	Finish	Predecessor
0		<b>Colorado 1.0</b>	<b>394 days</b>	<b>Tue 12/1/15</b>	<b>Wed 12/28/16</b>	
1		<b>1 Project Milestones</b>	<b>314 days</b>	<b>Thu 12/31/15</b>	<b>Tue 11/8/16</b>	
2		<b>1.1 Selection of UVS Finalist</b>	0 days	<b>Thu 12/31/15</b>	<b>Thu 12/31/15</b>	
3		<b>1.2 County Contracts Negotiated and Signed</b>	40 days	<b>Mon 1/4/16</b>	<b>Fri 2/12/16</b>	
4		<b>1.3 Certification of System</b>	1 day	<b>Tue 3/1/16</b>	<b>Tue 3/1/16</b>	
5		<b>1.4 System Deployment to Counties</b>	<b>59 days</b>	<b>Wed 3/2/16</b>	<b>Fri 4/29/16</b>	
6		<b>1.4.1 Deployment and Installation</b>	31 days	<b>Wed 3/2/16</b>	<b>Fri 4/1/16</b>	
7		<b>1.4.2 Install Trusted Builds</b>	26 days	<b>Mon 4/4/16</b>	<b>Fri 4/29/16</b>	
8		<b>1.5 Primary Election Milestones</b>	<b>58 days</b>	<b>Mon 5/2/16</b>	<b>Tue 6/28/16</b>	
9		<b>1.5.1 Ballot Production</b>	26 days	<b>Mon 5/2/16</b>	<b>Fri 5/27/16</b>	14SS-69 da
10		<b>1.5.2 UOCAVA Ballot Deadline</b>	1 day	<b>Sat 5/14/16</b>	<b>Sat 5/14/16</b>	
11		<b>1.5.3 Absentee ballots sent - Primary</b>	17 days	<b>Mon 6/6/16</b>	<b>Wed 6/22/16</b>	
12		<b>1.5.4 L&amp;A Testing - Primary</b>	11 days	<b>Tue 5/31/16</b>	<b>Fri 6/10/16</b>	
13		<b>1.5.5 Voting Centers Open - Primary</b>	9 days	<b>Mon 6/20/16</b>	<b>Tue 6/28/16</b>	
14		<b>1.5.6 Election Day - Primary</b>	0 days	<b>Tue 6/28/16</b>	<b>Tue 6/28/16</b>	
15		<b>1.6 General Election Milestones</b>	<b>58 days</b>	<b>Mon 9/12/16</b>	<b>Tue 11/8/16</b>	
16		<b>1.6.1 Ballot Production</b>	26 days	<b>Mon 9/12/16</b>	<b>Fri 10/7/16</b>	21SS-69 da
17		<b>1.6.2 UOCAVA Ballot Deadline</b>	1 day	<b>Sat 9/24/16</b>	<b>Sat 9/24/16</b>	
18		<b>1.6.3 Absentee ballots sent - General</b>	5 days	<b>Mon 10/17/16</b>	<b>Fri 10/21/16</b>	
19		<b>1.6.4 L&amp;A Testing - General</b>	11 days	<b>Mon 10/10/16</b>	<b>Thu 10/20/16</b>	
20		<b>1.6.5 Voting Centers Open - General</b>	16 days	<b>Mon 10/24/16</b>	<b>Tue 11/8/16</b>	
21		<b>1.6.6 Election Day - General</b>	0 days	<b>Tue 11/8/16</b>	<b>Tue 11/8/16</b>	
22		<b>2 Project Management</b>	<b>364 days</b>	<b>Thu 12/31/16</b>	<b>Wed 12/28/16</b>	
23		<b>2.1 Initiate Project</b>	<b>23 days</b>	<b>Thu 12/31/16</b>	<b>Fri 1/22/16</b>	
24		<b>2.1.1 Internal Project Kick-off</b>	1 day	<b>Thu 12/31/16</b>	<b>Thu 12/31/15</b>	
25		<b>2.1.2 Kick-off with State</b>	1 day	<b>Wed 1/6/16</b>	<b>Wed 1/6/16</b>	
26		<b>2.1.3 Kick-Off Meeting with Counties</b>	12 days	<b>Mon 1/11/16</b>	<b>Fri 1/22/16</b>	25SS
27		<b>2.2 System Certification</b>	<b>43 days</b>	<b>Tue 1/19/16</b>	<b>Tue 3/1/16</b>	
28		<b>2.2.1 UVS Certification Tasks</b>	<b>43 days</b>	<b>Tue 1/19/16</b>	<b>Tue 3/1/16</b>	
29		<b>2.2.1.1 Deadline for Cert. App. With TDP</b>	1 day	<b>Tue 1/19/16</b>	<b>Tue 1/19/16</b>	
30		<b>2.2.1.2 Completion of documentation review</b>	1 day	<b>Tue 1/26/16</b>	<b>Tue 1/26/16</b>	
31		<b>2.2.1.3 Prepare and finalize Test Plan Agreement</b>	1 day	<b>Fri 1/29/16</b>	<b>Fri 1/29/16</b>	
32		<b>2.2.1.4 Complete supplemental testing, if necessary</b>	1 day	<b>Mon 2/15/16</b>	<b>Mon 2/15/16</b>	
































ID	Task Mode	Task Name	Duration	Start	Finish	Predecessor
33		2.2.1.5 Certification of System	1 day	Tue 3/1/16	Tue 3/1/16	
34		2.3 Project Management Meetings w State/Counties	346 days	Mon 1/18/16	Wed 12/28/16	
35		2.3.1 Project Update Call	346 days	Mon 1/18/16	Wed 12/28/16	
60		2.4 Dominion Internal Project Management Meetings	348 days	Fri 1/15/16	Tue 12/27/16	
61		2.4.1 Project Update Call	348 days	Fri 1/15/16	Tue 12/27/16	
86		3 Procurement and Logistics	30 days	Mon 2/1/16	Tue 3/1/16	
87		3.1 Procurement	30 days	Mon 2/1/16	Tue 3/1/16	
88		3.1.1 ICC system	30 days	Mon 2/1/16	Tue 3/1/16	
89		3.1.1.1 Canon G1130	30 days	Mon 2/1/16	Tue 3/1/16	
90		3.1.1.2 Kofax board and software	30 days	Mon 2/1/16	Tue 3/1/16	
91		3.1.1.3 Dell all-in-one PC	30 days	Mon 2/1/16	Tue 3/1/16	
92		3.1.1.4 i-Button programmer	30 days	Mon 2/1/16	Tue 3/1/16	
93		3.1.1.5 Other Requested Supplies and Consumables	30 days	Mon 2/1/16	Tue 3/1/16	
94		3.1.2 ICX System	30 days	Mon 2/1/16	Tue 3/1/16	
95		3.1.2.1 Tablets	30 days	Mon 2/1/16	Tue 3/1/16	
96		3.1.2.2 Tablet Kiosk	30 days	Mon 2/1/16	Tue 3/1/16	
97		3.1.2.3 Mag Strip Reader	30 days	Mon 2/1/16	Tue 3/1/16	
98		3.1.2.4 Hub multiport network	30 days	Mon 2/1/16	Tue 3/1/16	
99		3.1.2.5 BMD Printer	30 days	Mon 2/1/16	Tue 3/1/16	
100		3.1.2.6 Networking Hardware	30 days	Mon 2/1/16	Tue 3/1/16	
101		3.1.2.7 Administrator Laptop	30 days	Mon 2/1/16	Tue 3/1/16	
102		3.1.2.8 Voting Booth	30 days	Mon 2/1/16	Tue 3/1/16	
103		3.1.2.9 Accessibility system hardware	30 days	Mon 2/1/16	Tue 3/1/16	
104		3.1.2.10 Other Identified or Requested IT Hardware	30 days	Mon 2/1/16	Tue 3/1/16	
105		3.1.3 EMS and Adjudication Hardware	30 days	Mon 2/1/16	Tue 3/1/16	
106		3.1.3.1 EMS Server	30 days	Mon 2/1/16	Tue 3/1/16	
107		3.1.3.2 EMS Workstation	30 days	Mon 2/1/16	Tue 3/1/16	
108		3.1.3.3 Adjudication Workstation	30 days	Mon 2/1/16	Tue 3/1/16	
109		3.1.3.4 Network Security Devices	30 days	Mon 2/1/16	Tue 3/1/16	
110		3.1.3.5 Monitors (2 server and Adjudication)	30 days	Mon 2/1/16	Tue 3/1/16	
111		3.1.3.6 Keyboard, Mouse, Cables...	30 days	Mon 2/1/16	Tue 3/1/16	
112		3.1.3.7 Report Printer	30 days	Mon 2/1/16	Tue 3/1/16	
113		3.1.3.8 Other Identified or Requested IT Hardware	30 days	Mon 2/1/16	Tue 3/1/16	

ID	Task Mode	Task Name	Duration	Start	Finish	Predecessor
114		<b>4 Configuration, Installation, Training and Testing</b>	<b>182 days</b>	<b>Tue 12/1/15</b>	<b>Mon 5/30/16</b>	
115		<b>4.1 System Configuration</b>	<b>51 days</b>	<b>Thu 12/31/15</b>	<b>Fri 2/19/16</b>	
116		<b>4.1.1 Create Election Data Import Bridge</b>	<b>49 days</b>	<b>Thu 12/31/15</b>	<b>Wed 2/17/16</b>	
117		4.1.1.1 Examine existing data structure	21 days	Thu 12/31/15	Wed 1/20/16	
118		4.1.1.2 Create data import bridge from customer database	21 days	Thu 1/21/16	Wed 2/10/16	117
119		4.1.1.3 Test import bridge and revise as required	7 days	Thu 2/11/16	Wed 2/17/16	118
120		<b>4.1.2 Customization of configurable options</b>	<b>49 days</b>	<b>Thu 12/31/15</b>	<b>Wed 2/17/16</b>	
121		4.1.2.1 Finalize ballot style template	28 days	Thu 12/31/15	Wed 1/27/16	2
122		4.1.2.2 Define configurable settings	28 days	Thu 12/31/15	Wed 1/27/16	2
123		4.1.2.3 Finalize reporting templates	21 days	Thu 1/28/16	Wed 2/17/16	121
124		<b>4.1.3 End-to-End Test</b>	<b>2 days</b>	<b>Thu 2/18/16</b>	<b>Fri 2/19/16</b>	119,121,12
125		<b>4.2 Installation and Acceptance Testing</b>	<b>121 days</b>	<b>Thu 12/31/15</b>	<b>Fri 4/29/16</b>	
126		<b>4.2.1 Preparation for Acceptance Testing</b>	<b>86 days</b>	<b>Thu 12/31/15</b>	<b>Fri 3/25/16</b>	
127		4.2.1.1 Review County Operations Space	18 days	Thu 12/31/15	Sun 1/17/16	2
128		4.2.1.2 Issue space recommendations	5 days	Mon 1/18/16	Fri 1/22/16	127
129		<b>4.2.1.3 Stage and Ship Delivery</b>	<b>25 days</b>	<b>Tue 3/1/16</b>	<b>Fri 3/25/16</b>	
130		4.2.1.3.1 Configure Servers	5 days	Tue 3/1/16	Sat 3/5/16	
131		4.2.1.3.2 Test Servers	5 days	Mon 3/7/16	Fri 3/11/16	130FS+1 da
132		4.2.1.3.3 Internal Acceptance of ICX, ICC and Adjudication systems	10 days	Mon 3/14/16	Wed 3/23/16	131FS+2 da
133		4.2.1.3.4 Configure ICC Systems	10 days	Tue 3/1/16	Thu 3/10/16	
134		4.2.1.3.5 Test ICC Systems	10 days	Tue 3/1/16	Thu 3/10/16	
135		4.2.1.3.6 Stage and Ship	12 days	Mon 3/14/16	Fri 3/25/16	
136		<b>4.2.2 Acceptance Testing</b>	<b>26 days</b>	<b>Mon 4/4/16</b>	<b>Fri 4/29/16</b>	
137		4.2.2.1 ICX Acceptance	19 days	Mon 4/4/16	Fri 4/22/16	
138		4.2.2.2 Acceptance Testing of EMS Systems	19 days	Mon 4/4/16	Fri 4/22/16	
139		4.2.2.3 Acceptance Testing of ICC Systems	19 days	Mon 4/4/16	Fri 4/22/16	
140		4.2.2.4 End-to-End System Tests	5 days	Mon 4/25/16	Fri 4/29/16	
141		<b>4.3 Training</b>	<b>182 days</b>	<b>Tue 12/1/15</b>	<b>Mon 5/30/16</b>	
142		<b>4.3.1 Finalize User Documentation</b>	<b>28 days</b>	<b>Tue 12/1/15</b>	<b>Mon 12/28/15</b>	
143		<b>4.3.1.1 ICX Documentation</b>	<b>28 days</b>	<b>Tue 12/1/15</b>	<b>Mon 12/28/15</b>	
144		4.3.1.1.1 ICX User Guide	28 days	Tue 12/1/15	Mon 12/28/15	
145		4.3.1.1.2 Acceptance Test Procedure, checklist and sign-off form	28 days	Tue 12/1/15	Mon 12/28/15	
146		4.3.1.1.3 L&A Procedure, checklist and sign-off form	28 days	Tue 12/1/15	Mon 12/28/15	






















ID	Task Mode	Task Name	Duration	Start	Finish	Predecessor
147		4.3.1.1.4 Poll-Worker Training Manual	28 days	Tue 12/1/15	Mon 12/28/15	
148		<b>4.3.1.2 ICC Documentation</b>	<b>28 days</b>	<b>Tue 12/1/15</b>	<b>Mon 12/28/15</b>	
149		4.3.1.2.1 ICC User Guide	28 days	Tue 12/1/15	Mon 12/28/15	
150		4.3.1.2.2 Acceptance Test Procedure, checklist and sign-off form	28 days	Tue 12/1/15	Mon 12/28/15	
151		4.3.1.2.3 Operator Training Manual	28 days	Tue 12/1/15	Mon 12/28/15	
152		4.3.1.2.4 L & A Procedure, checklist and sign-off form	28 days	Tue 12/1/15	Mon 12/28/15	
153		<b>4.3.1.3 Adjudication</b>	<b>28 days</b>	<b>Tue 12/1/15</b>	<b>Mon 12/28/15</b>	
154		4.3.1.3.1 Adjudication Users Guide	28 days	Tue 12/1/15	Mon 12/28/15	
155		4.3.1.3.2 Adjudication Quick Reference Guide	28 days	Tue 12/1/15	Mon 12/28/15	
156		4.3.1.3.3 Operator Training Manual	28 days	Tue 12/1/15	Mon 12/28/15	
157		4.3.1.3.4 L&A Procedure, checklist and sign-off form	28 days	Tue 12/1/15	Mon 12/28/15	
158		<b>4.3.1.4 EMS Documentation</b>	<b>28 days</b>	<b>Tue 12/1/15</b>	<b>Mon 12/28/15</b>	
159		4.3.1.4.1 EED Users guide	28 days	Tue 12/1/15	Mon 12/28/15	
160		4.3.1.4.2 RTR Users guide	28 days	Tue 12/1/15	Mon 12/28/15	
161		<b>4.3.2 Customer System Training</b>	<b>85 days</b>	<b>Mon 3/7/16</b>	<b>Mon 5/30/16</b>	
162		<b>4.3.2.1 Region 1 Training</b>	<b>78 days</b>	<b>Mon 3/7/16</b>	<b>Mon 5/23/16</b>	
163		4.3.2.1.1 ICC/Adjudication Operations training	2 days	Mon 3/7/16	Tue 3/8/16	
164		4.3.2.1.2 ICX Operations training	1 day	Wed 3/9/16	Wed 3/9/16	
165		4.3.2.1.3 EMS / RTR Training	5 days	Mon 4/25/16	Fri 4/29/16	
166		4.3.2.1.4 Pollworker Train the Trainer	1 day	Mon 5/23/16	Mon 5/23/16	
167		<b>4.3.2.2 Region 2 Training</b>	<b>73 days</b>	<b>Mon 3/14/16</b>	<b>Wed 5/25/16</b>	
168		4.3.2.2.1 ICC/Adjudication Operations training	2 days	Mon 3/14/16	Tue 3/15/16	
169		4.3.2.2.2 ICX Operations training	1 day	Wed 3/16/16	Wed 3/16/16	
170		4.3.2.2.3 EMS / RTR Training	5 days	Mon 5/2/16	Fri 5/6/16	
171		4.3.2.2.4 Pollworker Train the Trainer	1 day	Wed 5/25/16	Wed 5/25/16	
172		<b>4.3.2.3 Region 3 Training</b>	<b>68 days</b>	<b>Mon 3/21/16</b>	<b>Fri 5/27/16</b>	
173		4.3.2.3.1 ICC/Adjudication Operations training	2 days	Mon 3/21/16	Tue 3/22/16	
174		4.3.2.3.2 ICX Operations training	1 day	Wed 3/23/16	Wed 3/23/16	
175		4.3.2.3.3 EMS / RTR Training	5 days	Mon 5/9/16	Fri 5/13/16	
176		4.3.2.3.4 Pollworker Train the Trainer	1 day	Fri 5/27/16	Fri 5/27/16	
177		<b>4.3.2.4 Tier 1.1 Counties Training</b>	<b>64 days</b>	<b>Mon 3/28/16</b>	<b>Mon 5/30/16</b>	
178		4.3.2.4.1 ICC/Adjudication Operations training	2 days	Mon 3/28/16	Tue 3/29/16	
179		4.3.2.4.2 ICX Operations training	1 day	Wed 3/30/16	Wed 3/30/16	








ID	Task Mode	Task Name	Duration	Start	Finish	Predecessor
180		4.3.2.4.3 EMS / RTR Training	5 days	Mon 5/2/16	Fri 5/6/16	
181		4.3.2.4.4 Pollworker Train the Trainer	1 day	Mon 5/30/16	Mon 5/30/16	
182		5 2016 Primary Election	87 days	Mon 4/4/16	Wed 6/29/16	
183		5.1 Election Programming	56 days	Mon 4/4/16	Sun 5/29/16	
184		5.1.1 Import Jurisdictional Data	16 days	Mon 4/4/16	Tue 4/19/16	
185		5.1.1.1 Jurisdictional data imported	1 day	Mon 4/4/16	Mon 4/4/16	
186		5.1.1.2 Preliminary Election Database, Ballot and Report Creation	8 days	Fri 4/8/16	Fri 4/15/16	
187		5.1.1.3 Initial Ballot Proofs Reviewed by Counties	1 day	Mon 4/18/16	Mon 4/18/16	186FS+2 da
188		5.1.1.4 Initial Report Proofing Packages Reviewed by Counties	1 day	Tue 4/19/16	Tue 4/19/16	187
189		5.1.2 Final Election Ballot and Database Creation	11 days	Mon 5/2/16	Thu 5/12/16	
190		5.1.2.1 Ballot Certification Deadline for Primary	1 day	Mon 5/2/16	Mon 5/2/16	
191		5.1.2.2 Final Ballot and Report Proofs to County Officials	8 days	Tue 5/3/16	Tue 5/10/16	190
192		5.1.2.3 Ballot and Report Review by Client	1 day	Wed 5/11/16	Wed 5/11/16	191
193		5.1.2.4 Revisions to Ballots and/or Reports	1 day	Thu 5/12/16	Thu 5/12/16	192
194		5.1.3 Election Materials Provided to County	17 days	Fri 5/13/16	Sun 5/29/16	
195		5.1.3.1 Official Ballot Images generated	1 day	Fri 5/13/16	Fri 5/13/16	193
196		5.1.3.2 L&A Test Ballots Generated	8 days	Fri 5/13/16	Fri 5/20/16	193SS+1 da
197		5.1.3.3 Distribute Election Project Packages	7 days	Mon 5/23/16	Sun 5/29/16	196FS+2 da
198		5.2 Primary Election - Finalize Election Files & Logic and Accuracy Testing	12 days	Mon 5/30/16	Fri 6/10/16	
199		5.2.1 County Receives and Restores Election package	1 day	Mon 5/30/16	Mon 5/30/16	197
200		5.2.2 Test ballots provided to printer	3 days	Tue 5/31/16	Thu 6/2/16	199
201		5.2.3 Load Election Files to ICC and ICX	1 day	Tue 5/31/16	Tue 5/31/16	199
202		5.2.4 Scan test ballots, upload and verify results	10 days	Tue 5/31/16	Thu 6/9/16	199
203		5.2.5 Export Results to State-wide System	1 day	Fri 6/10/16	Fri 6/10/16	202
204		5.3 Election Support - Primary Election	17 days	Mon 6/13/16	Wed 6/29/16	
205		5.3.1 Mail Ballot Tabulation Support	16 days	Mon 6/13/16	Tue 6/28/16	
206		5.3.1.1 Region 1	16 days	Mon 6/13/16	Tue 6/28/16	
207		5.3.1.2 Region 2	16 days	Mon 6/13/16	Tue 6/28/16	
208		5.3.1.3 Region 3	16 days	Mon 6/13/16	Tue 6/28/16	
209		5.3.1.4 County Tier 1.1	16 days	Mon 6/13/16	Tue 6/28/16	
210		5.3.1.5 County Tier 1.1	16 days	Mon 6/13/16	Tue 6/28/16	
211		5.3.2 VSPC	9 days	Mon 6/20/16	Tue 6/28/16	
212		5.3.2.1 Region 1	9 days	Mon 6/20/16	Tue 6/28/16	

ID	Task Mode	Task Name	Duration	Start	Finish	Predecessor
213		5.3.2.2 Region 2	9 days	Mon 6/20/16	Tue 6/28/16	
214		5.3.2.3 Region 3	9 days	Mon 6/20/16	Tue 6/28/16	
215		5.3.2.4 County Tier 1.1	9 days	Mon 6/20/16	Tue 6/28/16	
216		5.3.2.5 County Tier 1.1	9 days	Mon 6/20/16	Tue 6/28/16	
217		<b>5.3.3 Election Day Support</b>	<b>3 days</b>	<b>Mon 6/27/16</b>	<b>Wed 6/29/16</b>	<b>14</b>
218		5.3.3.1 Region 1	3 days	Mon 6/27/16	Wed 6/29/16	
219		5.3.3.2 Region 2	3 days	Mon 6/27/16	Wed 6/29/16	
220		5.3.3.3 Region 3	3 days	Mon 6/27/16	Wed 6/29/16	
221		5.3.3.4 County Tier 1.1	3 days	Mon 6/27/16	Wed 6/29/16	
222		5.3.3.5 County Tier 1.1	3 days	Mon 6/27/16	Wed 6/29/16	
223		<b>6 General Election 2016</b>	<b>165 days</b>	<b>Tue 7/5/16</b>	<b>Fri 12/16/16</b>	
224		<b>6.1 Project Plan Review and Update</b>	<b>28 days</b>	<b>Tue 7/5/16</b>	<b>Mon 8/1/16</b>	
225		<b>6.1.1 Capture Lessons Learned</b>	<b>14 days</b>	<b>Tue 7/5/16</b>	<b>Mon 7/18/16</b>	
226		6.1.1.1 Internal Review	14 days	Tue 7/5/16	Mon 7/18/16	14FS+7 day
227		6.1.1.2 Stakeholder consultations	14 days	Tue 7/5/16	Mon 7/18/16	14FS+7 day
228		6.1.1.3 Review issues log	14 days	Tue 7/5/16	Mon 7/18/16	14FS+7 day
229		6.1.2 Revise Project Plan and Project Schedule	14 days	Tue 7/19/16	Mon 8/1/16	228,226,22
230		6.1.3 Revise Project and User Documentation	14 days	Tue 7/19/16	Mon 8/1/16	228,226,22
231		<b>6.2 General Election Supplemental Training for Trainers</b>	<b>16 days</b>	<b>Mon 9/19/16</b>	<b>Tue 10/4/16</b>	
232		<b>6.2.1 Region 1 Training</b>	<b>2 days</b>	<b>Mon 9/19/16</b>	<b>Tue 9/20/16</b>	
233		6.2.1.1 Refresh Training	2 days	Mon 9/19/16	Tue 9/20/16	
234		<b>6.2.2 Region 2 Training</b>	<b>2 days</b>	<b>Wed 9/21/16</b>	<b>Thu 9/22/16</b>	
235		6.2.2.1 Refresh Training	2 days	Wed 9/21/16	Thu 9/22/16	233SS+2 da
236		<b>6.2.3 Region 3 Training</b>	<b>2 days</b>	<b>Mon 9/26/16</b>	<b>Tue 9/27/16</b>	
237		6.2.3.1 Refresh Training	2 days	Mon 9/26/16	Tue 9/27/16	235SS+5 da
238		<b>6.2.4 County Tier 1.1</b>	<b>2 days</b>	<b>Wed 9/28/16</b>	<b>Thu 9/29/16</b>	
239		6.2.4.1 Refresh Training	2 days	Wed 9/28/16	Thu 9/29/16	237SS+2 da
240		<b>6.2.5 County Tier 1.1</b>	<b>2 days</b>	<b>Mon 10/3/16</b>	<b>Tue 10/4/16</b>	
241		6.2.5.1 Refresh Training	2 days	Mon 10/3/16	Tue 10/4/16	239SS+5 da
242		<b>6.3 Election Programming - General Election</b>	<b>25 days</b>	<b>Tue 9/6/16</b>	<b>Fri 9/30/16</b>	
243		<b>6.3.1 Import Jurisdictional Data</b>	<b>4 days</b>	<b>Tue 9/6/16</b>	<b>Fri 9/9/16</b>	
244		6.3.1.1 Jurisdictional data imported	1 day	Tue 9/6/16	Tue 9/6/16	
245		6.3.1.2 Preliminary Election Database, Ballot and Report Creation	2 days	Wed 9/7/16	Thu 9/8/16	244



ID	Task Mode	Task Name	Duration	Start	Finish	Predecessor
246		6.3.1.3 Initial Ballot Proofs Reviewed by Counties	1 day	Fri 9/9/16	Fri 9/9/16	244,245
247		<b>6.3.2 Final Election Ballot and Database Creation</b>	<b>9 days</b>	<b>Mon 9/12/16</b>	<b>Tue 9/20/16</b>	
248		6.3.2.1 Ballot Certification Deadline for General	1 day	Mon 9/12/16	Mon 9/12/16	245
249		6.3.2.2 Final Ballot and Report Proofs to County Officials	8 days	Tue 9/13/16	Tue 9/20/16	248
250		6.3.2.3 Ballot and Report Review by Client	1 day	Tue 9/13/16	Tue 9/13/16	249SS
251		6.3.2.4 Revisions to Ballots and/or Reports	1 day	Wed 9/14/16	Wed 9/14/16	250
252		<b>6.3.3 Election Materials Provided to County</b>	<b>16 days</b>	<b>Thu 9/15/16</b>	<b>Fri 9/30/16</b>	<b>250</b>
253		6.3.3.1 Official Ballot Images generated	1 day	Thu 9/15/16	Thu 9/15/16	251
254		6.3.3.2 L & A Test Ballots Generated	8 days	Fri 9/16/16	Fri 9/23/16	253
255		6.3.3.3 Distribute Election Project Packages	7 days	Sat 9/24/16	Fri 9/30/16	254
256		<b>6.4 General Election - Finalize Election Files &amp; Logic and Accuracy Testing</b>	<b>16 days</b>	<b>Wed 10/5/16</b>	<b>Thu 10/20/16</b>	<b>254</b>
257		6.4.1 County Receives and Restores Election package	1 day	Wed 10/5/16	Wed 10/5/16	
258		6.4.2 Test ballots provided to printer	3 days	Thu 10/6/16	Sat 10/8/16	257
259		6.4.3 Load Election Files to ICC and ICX	1 day	Mon 10/10/16	Mon 10/10/16	
260		6.4.4 Scan test ballots, upload and verify results	10 days	Mon 10/10/16	Wed 10/19/16	
261		6.4.5 Export Results to State-wide System	1 day	Thu 10/20/16	Thu 10/20/16	260FS+2 da
262		<b>6.5 Election Support - General Election</b>	<b>54 days</b>	<b>Mon 10/24/16</b>	<b>Fri 12/16/16</b>	
263		<b>6.5.1 Mail Ballot Tabulation Support</b>	<b>16 days</b>	<b>Mon 10/24/16</b>	<b>Tue 11/8/16</b>	
264		6.5.1.1 Region 1	16 days	Mon 10/24/16	Tue 11/8/16	
265		6.5.1.2 Region 2	16 days	Mon 10/24/16	Tue 11/8/16	
266		6.5.1.3 Region 3	16 days	Mon 10/24/16	Tue 11/8/16	
267		6.5.1.4 County Tier 1.1	16 days	Mon 10/24/16	Tue 11/8/16	
268		6.5.1.5 County Tier 1.1	16 days	Mon 10/24/16	Tue 11/8/16	
269		<b>6.5.2 VSPC support</b>	<b>16 days</b>	<b>Mon 10/24/16</b>	<b>Tue 11/8/16</b>	
270		6.5.2.1 Region 1	16 days	Mon 10/24/16	Tue 11/8/16	
271		6.5.2.2 Region 2	16 days	Mon 10/24/16	Tue 11/8/16	
272		6.5.2.3 Region 3	16 days	Mon 10/24/16	Tue 11/8/16	
273		6.5.2.4 County Tier 1.1	16 days	Mon 10/24/16	Tue 11/8/16	
274		6.5.2.5 County Tier 1.1	16 days	Mon 10/24/16	Tue 11/8/16	
275		<b>6.5.3 Election Day Support</b>	<b>3 days</b>	<b>Mon 11/7/16</b>	<b>Wed 11/9/16</b>	
276		6.5.3.1 Region 1	3 days	Mon 11/7/16	Wed 11/9/16	
277		6.5.3.2 Region 2	3 days	Mon 11/7/16	Wed 11/9/16	
278		6.5.3.3 Region 3	3 days	Mon 11/7/16	Wed 11/9/16	



ID	Task Mode	Task Name	Duration	Start	Finish	Predecessor
279		6.5.3.4 County Tier 1.1	3 days	Mon 11/7/16	Wed 11/9/16	
280		6.5.3.5 County Tier 1.1	3 days	Mon 11/7/16	Wed 11/9/16	
281		6.5.4 Project Plan Review and Update	33 days	Mon 11/14/16	Fri 12/16/16	
282		6.5.4.1 Capture Lessons Learned	33 days	Mon 11/14/16	Fri 12/16/16	
283		6.5.4.1.1 Internal Review	5 days	Mon 11/14/16	Fri 11/18/16	
284		6.5.4.1.2 Stakeholder consultations	5 days	Mon 12/5/16	Fri 12/9/16	
285		6.5.4.1.3 Review issues log	5 days	Mon 12/12/16	Fri 12/16/16	

[illegible]







[illegible]

[illegible]



[illegible]



[illegible]

Exhibit  
PLT 0028  
MALKIN

STATE OF COLORADO )  
County of Douglas ) ss.

COMES NOW, Affiant Joseph T. Oltmann, being first duly sworn, under oath, and states under penalty of perjury that the following information is true and accurate within his personal knowledge and belief:

My name Joseph Oltmann. I am over eighteen years of age. I am not suffering under any mental disability and am competent to give this sworn affidavit. I am able to read and write and to give this affidavit voluntarily and on my own free will and accord. No one has used any threats, force, pressure, or intimidation to make me sign this affidavit. I make this affidavit in support of the truth.

I am the CEO of a tech company based just outside of Denver, Colorado. I am also the founder of an organization called FEC United. [fecnited.com] The goal of this organization is to restore constitutional integrity to our community and empower those in our community to stand up to state and national leadership that intends to suppress the rights of individuals holistically.

Through this organization "FEC" I became a target of journalists who began to slander both me and my organization. I became the topic of Antifa and extremists through my involvement in a movement to resist the narrative that police are bad and our society represented the rhetoric shared by these extremists. As a result of these attacks, I started researching Antifa, BLM, Inc. and their connection to violence and unrest inside of our communities. As a result, I set out to infiltrate Antifa meetings and de-mask those Antifa members who are journalists in the mainstream media in Colorado specifically.

On or about the week of September 27, 2020, I was able to attend an Antifa meeting which appeared to be between Antifa members in Colorado Springs and in Denver Colorado. I cannot verify the connection between the two or the leadership as they were disorganized. Discussions of Our Revolution and Antifa were discussed. Rhetoric of "eliminating fascists" and frustration as to the dwindling of support to rally in the street was evident.

Then I honed in among other conversations key actors in the organization who work for local and state news publications. One such person of interest was \_\_\_\_\_, identified leader of Our Revolution in El Paso County (Southern Colorado) and Antifa leader of the same area.

name is actually . She is a journalist at Colorado Springs Independent, Colorado Springs Business Journal and a freelance writer for several online publications. Others to remain unnamed in this were present.

The conversation went like this:

Someone identified as "Eric" began to speak. Someone asked who Eric was, and someone else replied "he is the Dominion guy" [paraphrased].

Eric then began to speak after being told to continue, but was interrupted and asked by someone, "What are we going to do if Trump wins this fucking election?"

Eric responded, "Don't worry about the election. Trump is not going to win. I made fucking sure of that.. Hahaha"

Someone responded, "Fucking right."

Eric continued with fortifying the groups and recruiting. I would describe his tone as eccentric and boisterous. I wrote down his name and started to do some research into him.

At the time, I thought that they were so disconnected with reality that they think they can "make sure Trump is not elected."

I started with a simple google search: Keywords: "Eric," "Dominion," "Denver Colorado." The fifth result in organic search returned:

Dominion Voting Systems | Employee Profiles, Emails, Mutual ...

www.leadcandy.io › company › Dominion-Voting-Syst...

Find people working at Dominion Voting Systems. LeadCandy provides Full ... Denver, Colorado. VIEW FULL PROFILE ... FULL PROFILE. Eric Coomer's photo ...

Above that were results for Eric Schussler- Old Dominion University and Eric E Johnson, Attorney - Sherman & Howard. The first two on organic search however was as follows:

Dominion - Colorado Secretary of State

www.sos.state.co.us › elections › files › projectPlans  
PDF

Sep 9, 2016 — our most recent pilots in the City and County of Denver and Mesa County.

... 1 Democracy Suite is a registered trademark of Dominion Voting Systems. ... Eric

Coomer graduated from the University of California, Berkeley in ...

And

Eric Coomer's email & phone | Dominion Voting Systems's ...

rocketreach.co › eric-coomer-email\_7112825

Location, Denver, Colorado, United States. Work, Director, Market Strategy @ **Dominion**

Voting Systems Member, Board of Directors @ Friends of Levitt Pavilion ...

I began doing research on Eric Coomer and discovered that Colorado Secretary of state link the following about Dr. Eric Coomer on page 26:

*"Eric Coomer graduated from the University of California, Berkeley in 1997 with a Ph.D. in Nuclear Physics. After working in IT consulting for several years, Eric entered the elections industry in 2005 with Sequoia Voting Systems as Chief Software Architect. After three years with the company, Eric took over all development operations as Vice President of Engineering. When Sequoia was acquired by Dominion Voting Systems in 2010, Eric joined the DVS team as Vice President of US Engineering overseeing development in the Denver, Colorado office.*

*Recently, Eric has taken over as the Director of Product Strategy driving the creation of next generation products through close collaboration with customers, combined with a deep understanding of technology and the needs of Elections departments throughout the United States and abroad. Eric has been an active participant in the development of the IEEE common data format for Elections systems, as well as the working group for developing standards for Risk-Limiting Audits for elections results. When not designing new products, Eric supports large and small scale customers during Election season."*

I did some cursory research on Eric, but my conclusion was that he was either a part of the government or not relevant to the conversation. In other words, this was not a target I would



identify as being influential in Antifa. My conclusion was based on his credentials of having a PhD in Nuclear Physics. Did not add up for someone with that intelligence. I set it aside and concentrated my focus on the activist journalist who were actually Antifa members.

On October 15, 2020 I spoke at an FEC meeting in Bandimere Speedway. It was a rally around the unconstitutional actions of Jefferson County, Colorado government leadership to hurt Bandimere Speedway. I spoke and before the event started they escorted a suspected Antifa Journalist Erik Maulbetsch [Colorado Recorder] off the premises. In that meeting I talked about outing activist journalists who were Antifa and holding them accountable in our community for attacking organizations like FEC United that serve the community.

These activist journalists frequently slander people of faith, conservatives and call them names that defame them in the community. I had enough and warned that we would call them out by name. Maulbetsch wrote an article reflecting this as he was listening in online and decided to omit details about the meeting, causing the entire journalistic community to wonder if they were on the list. It had a positive effect contrary to their intentions.

On Friday November 6th, I received a forwarded article about Georgia irregularities on the election day. I normally do not read many of these articles because I am inundated with information both from FEC, and my company. I started reading it and noticed Eric Coomer was the spokesperson for a company called Dominion Voting Systems. I immediately stopped and started to go back through my notes to find the info on Eric Coomer. I then started research Dominion Voting Systems. The information became rather scary as everywhere I looked I found Eric's name. Some listing him as VP of Security and others calling him Director of Strategy and Security. I began my search for everything Eric Coomer, Dr. Eric Coomer and any information related to legal filings, RFPs, states using Dominion, Colorado uses and even areas in Colorado that do not use Dominion.

I then turned my attention to Eric Coomer's Facebook profile and page while I gathered information on correlating email addresses, profiles, screen names, etc. Searching Twitter, Reddit, Facebook, 4Chan, etc etc.

I was able to get screenshots of Eric Coomer's Facebook posts going back to 2016. What I discovered was disturbing. Anti-Trump rhetoric, posts referring to: Fuck USA, Fuck the Police, A.C.A.B., posts that were anti Conservative, and even posts being happy someone died. Then the bigger shocker. He reposted the Antifa "Manifesto" letter to Donald Trump. I knew that I had the right guy and someone that was clearly mentally unstable and radical. I started digging into the

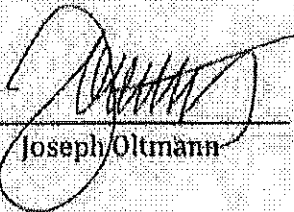
code irregularities and tying all of the pieces together with the irregularities and the Dominion uses in the disputed states. The correlation was astonishing. I then found the information related to justifying voting machines being online and his justification that they had "hardware and IP address protection". This statement by itself is FALSE.

I then attempted to reach out to all sources to bring this information to light. Calling major news stations and attempting to connect with the DOJ.

I took the information to the listeners of an organization that I also own called Conservative Daily. We have a podcast that we do on weekdays. I felt I had enough information and was confident that the Eric on the conference call was the same Eric Coomer that worked for Dominion. I was also confident that given the Facebook and other information I was able to collect that Eric Coomer was interfering with the election and as he admits in one of his posts that people at his company think and feel the same way he does. I began to research his patents, who owns them, the pattern of states they acquired as clients.

I began to research the connection to Diane Feinstein, her husband, campaign manager, Clinton Foundation and became worried that the finger of radicals had taken away the voice of the American people in deciding the election. I used ARIMA analysis to show me trends on data and probability models to prove that they were in fact using code and technology to ghost votes, switch votes or even remove probable ballots completely. Code is random unless it is not. Since we are a data company and understand artificial intelligence and use of neural networks, we understand the capabilities of creating chaos in outcome based on weighted density of probable voters.

These statements are true and accurate to the best of my knowledge.



Joseph Oltmann

STATE OF COLORADO  
COUNTY OF Douglas

Personally appeared before me, LYNN KIEFFER, a Notary Public in and for the aforesaid State and County, JOSEPH T OLTMANN, the within named bargainer, with whom I am personally acquainted and who, after being duly sworn, acknowledged that she executed the foregoing Agreement for the purposes contained therein.

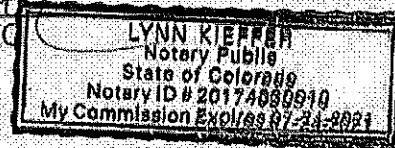
  
JOSEPH T OLTMANN

Sworn to and subscribed before me this 17<sup>th</sup> day of November, 2020.

My Commission Expires:

07-24-2021

  
NOTARY PUBLIC



REPORTER'S NOTE:

EXHIBIT 30

Video File

PRESERVED IN NATIVE FORMAT  
(AVAILABLE UPON REQUEST.)